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SEC v. PFG, LLC

Invoice Date: October 31, 2015
End of Billing Date: Oct 31/15

Attention: Securities Exchange Commission

Client #: 676
Inv #: 12310

RE: SEC v. Aubrey Lee Price, PFG LLC et al, Case No. 1:12-cv-2296

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Aug-26-15	[Asset disposition] Correspondence with Venezuela counsel.	0.10	26.50	MDV
Sep-09-15	[Asset disposition] Strategize with Receiver regarding sale of farms and negotiations with Osama Lwis and phone conference and correspondence with Venezuela counsel regarding same.	0.60	159.00	MDV
Sep-10-15	[Asset disposition] Discuss with M. Damian preparing Agreement for the sale of farm in Venezuela and the procedures and logistics for having that Agreement signed and translated so an Agreement in Venezuela can be prepared based on the first Agreement, which will be submitted to the Court for approval, and resolving certain issues related to O. Lwis, his frozen accounts and the proceeds of the sale of the farm (.3).	0.30	79.50	KDM
	[Asset disposition] Review information regarding negotiations regarding sales of farms and correspondence with Venezuela counsel regarding same (.7); phone conference with Venezuela counsel regarding negotiations regarding sale of farms and settlement with Osama Lwis (.5).	1.20	318.00	MDV

Sep-20-15	[Asset disposition] Review update from Venezuela counsel.	0.20	53.00	MDV
Sep-21-15	[Asset disposition] Review update and status and correspondence with Venezuela counsel.	0.30	79.50	MDV
Sep-23-15	[Asset disposition] Work on gathering the closing documents for the sale of O. Lwis's condo in Florida, and discuss with Receiver the status and timing of the sale of the Venezuela property (.4).	0.40	106.00	KDM
	[Asset disposition] Phone conference with Venezuela counsel regarding negotiations with prospective purchaser of farms and negotiations with Lwis (.6); strategize with Receiver regarding same (.2); review memorandum from Venezuela counsel; review materials regarding negotiations with Lwis; and prepare authorization letter regarding farm negotiations (1.8).	2.60	689.00	MDV
Oct-05-15	[Asset disposition] Review update from Venezuela counsel regarding farms (.2); strategize with M. Damian regarding same (.1); correspondence with Venezuelan counsel regarding same (.1).	0.40	106.00	MDV
Oct-13-15	[Asset disposition] Strategize with C. Perez regarding preparation of Motion to Approve sale or assignment of the Receiver's interest in one of the farms in Venezuela, review emails with Receiver and M. Visconti regarding same, and provide template for Motion and proposed Order (.2).	0.20	53.00	KDM
Oct-14-15	[Asset disposition] Strategize with C. Perez regarding certain aspects of the Motion to approve sale of Receiver's interest in one of the farms in Venezuela and provide additional information to be included in Motion (.4); exchange emails with M. Visconti regarding the revisions to be made to the Motion and whether it should request expedited relief and provide certain language for the Motion (.3).	0.70	185.50	KDM

Oct-16-15	[Asset disposition] Prepare and send email to counsel for SEC regarding the proposed sale of the Receiver's interest in the corn farm with summary of the proposed sale and the benefit to the Estate (.2); emails with M. Visconti regarding the status of obtaining the position of the SEC for purposes of reflecting it in the Motion to approve the sale (.1); prepare and send to M. Visconti explanation regarding basis for expedited relief to be inserted into the Motion (.2).	0.50	132.50	KDM
Oct-19-15	[Asset disposition] Email from counsel for SEC posing questions regarding the Receiver's proposed sale of the corn farm in Venezuela and prepare, review and revise the Motion to approve the sale, and prepare and send email responding to questions and providing the latest revised version of the Motion to approve the sale (.4); exchange emails with M. Visconti regarding the status of the SEC's consideration of our proposed Motion to approve the sale and the questions posed by counsel (.1).	0.50	132.50	KDM
Oct-21-15	[Asset disposition] Follow up with counsel for SEC regarding approval of the sale of the corn farm in Venezuela, receive email from counsel regarding approval, exchange emails with M. Visconti regarding same, and coordinate filing of Motion to approve sale and request for expedited relief (.2); exchange emails with team members regarding proposed Order and having Venezuela counsel approve the form of the Order before submitting to the Court (.1).	0.30	79.50	KDM
	[Asset disposition] Edit/Revise Motion to Approve Sale of Farm and prepare Proposed Order (.5); review update from Venezuela counsel (.2).	0.70	185.50	MDV
Oct-26-15	[Asset disposition] Discuss with M. Visconti the sufficiency of the Order approving the sale of the corn farm from the buyer's perspective and the preliminary approval required to comply with certain Venezuela procedures and whether a separate order is necessary.	0.20	53.00	KDM

Oct-27-15	[Asset disposition] Review correspondence and documents from Venezuela counsel regarding status of negotiations for sale of farms (.3); review Court Order approving sale of farm (.1); research prior communications regarding R. Rodriguez (.3).	0.70	185.50	MDV
Oct-28-15	[Asset disposition] Conference call with Venezuela counsel (.8); draft update/follow-up (.2).	1.00	265.00	MDV
Oct-29-15	[Asset disposition] Review multiple e-mails from Venezuelan counsel and draft agreements regarding sale of corn farm and meet with counsel regarding same.	1.30	344.50	MME
Oct-30-15	[Asset disposition] Strategize with Receiver regarding status and plans for moving forward with negotiations for sale of farms (.3); review documents from Venezuela counsel and correspondence regarding same (.4).	0.70	185.50	MDV
Aug-02-15	[Asset analysis and recovery] Review update from Venezuela counsel.	0.10	26.50	MDV
Aug-03-15	[Asset analysis and recovery] Review and respond to insurance counsel regarding letter to Evanston (.3); respond to Venezuelan counsel regarding settlement issue (.2); respond to insurance counsel regarding various other issues (.3).	0.80	212.00	MME
	[Asset analysis and recovery] Emails with special insurance counsel and Receiver regarding approval of revisions to joint demand letter with the FDIC-R to Evanston insurance company, the scheduling of the mediation, and the strategy for pursuing the bond (.2); emails with special insurance counsel regarding FDIC-R's revisions to the joint demand letter and review the proposed revisions and authorize counsel to send letter to Evanston's counsel (.3); emails with counsel for FDIC-R regarding the status of certain litigation actions and related issues (.2); exchange further emails with special insurance counsel regarding the proposed mediator and	1.30	344.50	KDM

the scheduling of the mediation of the Receiver's and the FDIC-R's claims against the Evanston policy (.2); work with M. Spencer on investigating the Estate's claim against a investment company for purposes of preparing proof of claim and coordinate following up with A.L. Price and his father to obtain information regarding PFG's investment in that company (.3); review email from A.L. Price to O. Lwis and discuss with Receiver (.1).

	[Asset analysis and recovery] Correspondence with Venezuela counsel regarding Lwis agreements (.1).	0.10	26.50	MDV
	[Asset analysis and recovery] (Zegalia) Phone call and email to opposing counsel requesting financial documentation.	0.10	15.00	MJS
Aug-04-15	[Asset analysis and recovery] (Nelson Mullins) (No charge) Draft email regarding deposition schedule and review rebuttal testimony deposition.	0.20	0.00	PFV
	[Asset analysis and recovery] (Nelson Mullins) (No charge) Review email regarding expert invoices.	0.10	0.00	PFV
	[Asset analysis and recovery] Exchange further emails with special insurance counsel regarding the mediation with Evanston, scheduling issues and other possible mediators (.2); email from special insurance counsel regarding his correspondence with counsel for Evanston, review email from counsel for Evanston regarding our settlement demand our response to Evanston's response to our initial demand, asserting various policy exclusions, and the scheduling of mediation, and strategize with special insurance counsel regarding response to that email (.3).	0.50	132.50	KDM
	[Asset analysis and recovery] (Nelson Mullins) (No charge) Finalize memorandum summarizing key points in Ian Ratner's deposition.	5.10	0.00	BAJ

	[Asset analysis and recovery] (Nelson Mullins) (No charge) Scheduling of Ian Ratner deposition (rebuttal report).	0.20	0.00	BAJ
Aug-05-15	[Asset analysis and recovery] Meet with FDIC counsel regarding various issues.	0.30	79.50	MME
	[Asset analysis and recovery] (Nelson Mullins) (No charge) Review correspondence regarding deposition schedule.	0.20	0.00	PFV
	[Asset analysis and recovery] Strategize with Receiver and G. Giberson regarding upcoming meeting with counsel for FDIC-R regarding various matters (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] (Nelson Mullins) Communication with Larry Slovensky regarding scheduling deposition of Ian Ratner, draft request for extension of time and draft proposed order.	0.40	106.00	BAJ
	[Asset analysis and recovery] (Zegalia) Phone call to opposing counsel requesting settlement offer and financial information (.1); review deadlines (.1).	0.20	30.00	MJS
	[Asset analysis and recovery] Email Mr. Price regarding investments in Longtop Financial Technologies (.2); research regarding Longtop Financial Technologies (.1).	0.30	45.00	MJS
Aug-06-15	[Asset analysis and recovery] Telephone call with counsel regarding status and strategy.	0.40	106.00	MME
	[Asset analysis and recovery] (Nelson Mullins) Review PCAOB report regarding Thigpen and confer with team regarding same and impact on trial testimony.	1.20	318.00	PFV
	[Asset analysis and recovery] (Nelson Mullins) Conferences with P. Valori, M. Damian, and G. Giberson regarding [REDACTED].	1.20	318.00	BAJ
	[Asset analysis and recovery] (Nelson Mullins) Research regarding [REDACTED].	0.80	212.00	BAJ

	[Asset analysis and recovery] (Nelson Mullins) Telephone call with Ivan Garces regarding [REDACTED].	0.40	106.00	BAJ
	[Asset analysis and recovery] Review correspondence from Venezuela counsel regarding Lwis.	0.10	26.50	MDV
Aug-07-15	[Asset analysis and recovery] Follow up on negotiations with certain investors who may have received net gains regarding the entry into tolling agreements and discuss strategy with team members (.3).	0.30	79.50	KDM
	[Asset analysis and recovery] Exchange emails with counsel for the SEC regarding the status of certain litigation matters (.2); meet with Receiver regarding the status of the receivership and all pending litigation matters (.3).	0.50	132.50	KDM
	[Asset analysis and recovery] (Nelson Mullins) Telephone call with Ivan Garces regarding [REDACTED] and conduct Westlaw research regarding same.	0.40	106.00	BAJ
	[Asset analysis and recovery] Telephone call with [REDACTED].	0.20	53.00	BAJ
	[Asset analysis and recovery] (Nelson Mullins) Telephone call with L. Slovensky to discuss motion for extension of time; revise draft; coordinate revisions with L. Slovensky; supervise filing of motion and proposed order.	0.40	106.00	BAJ
Aug-10-15	[Asset analysis and recovery] (Scan Action) Review Order granting Defendants' motion for extension of time to file amended answer to the Complaint, discuss with team members, and coordinate calendaring of new deadline (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] (Zegalia) Phone call to opposing counsel regarding settlement.	0.10	15.00	MJS

Aug-11-15	[Asset analysis and recovery] Review Court's order on SCAN and discuss with counsel (.1); various conference with counsel regarding status and strategy (.2).	0.30	79.50	MME
	[Asset analysis and recovery] (Nelson Mullins) Conference with Receiver regarding settlement conference.	0.10	26.50	PFV
	[Asset analysis and recovery] (Nelson Mullins) Draft email to Opposing Counsel regarding deposition and Mediation schedule.	0.10	26.50	PFV
	[Asset analysis and recovery] (Scan Action) Review Order granting oral motion of Defendants Archila and Garcia for extension of time to file Answer so they can hire counsel, discuss with Receiver and coordinate calendaring of new deadline (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] (SCAN) (No charge) Review order granting extension of time to respond to complaint.	0.10	0.00	AF
	[Asset analysis and recovery] (Nelson Mullins) (No charge) Review Order Granting Plaintiff's Unopposed Motion for Extension of Time to Depose Rebuttal Expert Witness and to File Summary Judgment Motions.	0.30	0.00	pl
Aug-12-15	[Asset analysis and recovery] Exchange multiple emails with forensic accountant and AUSA handling the restitution hearing for Price regarding the Court's scheduling the hearing and scheduling a call to prepare for the hearing (.3); receive notice from counsel for various investors in FINRA actions against FSC Securities regarding entry of order awarding investors full amounts of their losses and discuss with team members, review the Order and related documents calculating the awards, and make note for purposes of claims process and reducing claims of those investors (.3); review email from A.L. Price and O. Lwis and from O. Lwis to his attorney and emails with the Receiver's Venezuela counsel and prepare and send email to A.L. Price's father regarding communications with O. Lwis in	0.80	212.00	KDM

light of the ongoing settlement negotiations with him (.2).

Aug-13-15	[Asset analysis and recovery] (Nelson Mullins) Review email from opposing counsel.	0.10	26.50	PFV
	[Asset analysis and recovery] (Nelson Mullins) Conference with opposing counsel regarding deposition of rebuttal expert and settlement conference.	0.10	26.50	PFV
	[Asset analysis and recovery] (Nelson Mullins) Draft status email regarding settlement conference.	0.20	53.00	PFV
	[Asset analysis and recovery] (Nelson Mullins) (No charge) Email with opposing counsel regarding mediation and deposition schedule.	0.20	0.00	PFV
	[Asset analysis and recovery] (Nelson Mullins) Email with team and confer with Receiver regarding mediation and deposition schedule.	0.20	53.00	PFV
	[Asset analysis and recovery] Exchange further emails with AUSA and forensic accountant regarding preparation for restitution hearing in Price's criminal action in the S.D. Ga. and review the AUSA's victims analysis based on forensic accountant's investor analysis in preparation for call with AUSA and forensic accountant (.8); attend call with AUSA and forensic accountant to prepare for and discuss logistics for the hearing (.4); telephone call to AUSA regarding certain logistics and procedures for the hearing and engaging forensic accountant as an expert (.3); exchange emails with forensic accountant regarding the hearing and related matters (.2); discuss with Receiver status of certain pending litigation matters (.2); exchange emails with Jim Price regarding communications between A.L. Price and O. Lwis and the Receiver's negotiations with O. Lwis (.2).	2.10	556.50	KDM
	[Asset analysis and recovery] (Zegalia) Phone	0.10	15.00	MJS

call with opposing counsel regarding financial documents.

Aug-14-15	[Asset analysis and recovery] (Nelson Mullins) E-mails with counsel regarding status and strategy for settlement conference.	0.20	53.00	MME
	[Asset analysis and recovery] (Nelson Mullins) Email with opposing counsel regarding Slovensky.	0.10	26.50	PFV
	[Asset analysis and recovery] Review letter and statement from Fidelity Investments and confirm that all assets in PFG accounts were already transferred to the Estate (.2); exchange emails with forensic accountant and AUSA regarding the updated analysis of investor losses and spreadsheets analyzing investor losses, net winners, and transfers to and from possible investors (.2); review updated analyses and spreadsheets from forensic accountant and exchange further emails with forensic accountant and AUSA regarding same (.4); telephone calls with forensic accountant and AUSA regarding the updated forensic reports (.5); exchange emails with AUSA regarding the investor losses for purposes of the restitution hearing (.2); exchange emails with forensic accountant regarding same (.2).	1.70	450.50	KDM
	[Asset analysis and recovery] (Zegalia) Review Financial Affidavit from J. Zegalia and coordinate having M. Spencer confirm assets reported therein (.3).	0.30	79.50	KDM
Aug-17-15	[Asset analysis and recovery] (Lwis action) Emails with financial institution regarding production of documents responsive to subpoena for financial records and discuss with team members (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] (Zegalia action) Emails to and from forensic accountant regarding the documents supporting forensic analysis of transfers from receivership entities to J. Zegalia, review those documents and strategize with M. Spencer regarding settlement negotiations with J. Zegalia's	0.70	185.50	KDM

counsel (.4); meet with M. Spencer regarding the holes in the financial records and affidavit provided by J. Zegalia and additional records we need for purposes of evaluation his claimed inability to pay any amount of Receiver's demand and coordinate requesting further documents and information from counsel to complete investigation of his assets and ability to pay (.3).

[Asset analysis and recovery] Exchange emails with forensic accountant and AUSA regarding forensic accountant's updated analysis of investor activity and analysis of transfers to and from net winners and net losers, and review those updated analyses (.5).	0.50	132.50	KDM
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[Asset analysis and recovery] (Nelson Mullins) Prepare master timeline of all key events.	2.10	556.50	BAJ
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[Asset analysis and recovery] (Zegalia) (Reduced time) Review financial documents provided by opposing counsel (1.6); Confer with K. Murena regarding settlement strategy (.2); phone call to opposing counsel regarding settlement (.1).	1.00	150.00	MJS
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Aug-18-15	[Asset analysis and recovery] (Zegalia Clawback) Receive update from M. Spencer regarding her recent communications with counsel for J. Zegalia and coordinate providing him with our forensic records of the transfers to him for purposes of determining what J. Zegalia did with those funds and to confirm that they are not recoverable from other accounts or parties (.2).	0.20	53.00	KDM
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[Asset analysis and recovery] (Nelson Mullins) Categorize documents for Timeline and summary judgment statement of facts.	0.60	159.00	BAJ
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[Asset analysis and recovery] (Zegalia) Phone call with opposing counsel regarding settlement (.3); prepare supporting documents to send to opposing counsel (.3); email opposing counsel regarding supporting documentation (.1).	0.70	105.00	MJS
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Aug-19-15	[Asset analysis and recovery] (Nelson Mullins) Finalize timeline and prepare memo summarizing key facts.	1.30	344.50	BAJ
	[Asset analysis and recovery] (Zegalia) Phone call to opposing counsel regarding settlement.	0.20	30.00	MJS
Aug-20-15	[Asset analysis and recovery] (SCAN Action) Review Order granting final extension of time for Defendants to respond to the Complaint and coordinate calendaring of deadline (.2); telephone calls from and to U.S. counsel for Archila and Garcia regarding the action against SCAN and the final extension of time to respond to the Complaint (.2).	0.40	106.00	KDM
	[Asset analysis and recovery] (Lwis Action) Exchange emails with representative of Mercantil Commercebank regarding its production of documents pursuant to our Subpoena and coordinate downloading the production from the Bank's secure site (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] Emails from and to AUSA handling the restitution hearing in Price's criminal matter regarding the proposed findings of fact and conclusions of law (.2).	0.20	53.00	KDM
Aug-21-15	[Asset analysis and recovery] Exchange multiple emails with AUSA and forensic accountant regarding the findings of fact and conclusions of law to be submitted by the AUSA to the Court for purposes of the restitution hearing in Price's criminal action and provide input and revisions thereto (.6); telephone call from AUSA regarding same (.3); emails with forensic accountant regarding the scope and dates covered by the consolidated account reconstruction and clarifying same in the AUSA's findings of fact and conclusions of law, review revisions to findings of fact and conclusions of law, and provide further comments (.3).	1.20	318.00	KDM

	[Asset analysis and recovery] (Bond) Exchange emails with special insurance counsel regarding letter from counsel for St. Paul Mercury regarding the Receiver's claim to the bond and mediation, and the proposed mediator, review letter and confer with team members regarding same (.3).	0.30	79.50	KDM
Aug-24-15	[Asset analysis and recovery] (Nelson Mullins) Review email regarding revised subpoena to expert Ratner.	0.20	53.00	PFV
	[Asset analysis and recovery] (Bond claim) Exchange emails with special insurance counsel regarding mediation with St. Paul Mercury on the Receiver's and the FDIC-R's claim against the Bond (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] (Evanston claim) Review emails with special insurance counsel regarding Evanston's counsel's response to the Receiver's demand letter and the basis for the Receiver's and the FDIC-R's respective claims against the Evanston policy and follow up with special insurance counsel regarding status of negotiations with counsel for Evanston and scheduling settlement conference or mediation to resolve the claims (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] (Zegalia clawback) Receive update from M. Spencer regarding her efforts to obtain financial records from Zegalia showing where the funds he received from PFG were transferred and coordinate scheduling his deposition and sending him a formal document request (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] (Nelson Mullins) (Reduced time) Prepare outline for deposition of Ratner as rebuttal expert, review original and rebuttal report by Ratner, review report by Garces, review summary of key facts and timeline.	2.10	556.50	BAJ
	[Asset analysis and recovery] (Nelson Mullins) Discuss deposition preparation with	0.40	106.00	BAJ

P. Valori and correspond with L. Slovensky regarding production of documents.

[Asset analysis and recovery] Strategize with Receiver regarding Lwis and Venezuela farms (.1); correspondence with Venezuela counsel (.1).	0.20	53.00	MDV
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[Asset analysis and recovery] (Zegalia) Phone call to opposing counsel regarding bank documentation (.1); review pre-trial deadlines (.1).	0.20	30.00	MJS
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Aug-25-15	[Asset analysis and recovery] E-mail and telephone call regarding status of harvest and settlement with Lwis (.4); review response from Bond Carrier and e-mail with counsel regarding same (.4).	0.80	212.00	MME
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[Asset analysis and recovery] (Bond) Exchange multiple emails with special insurance counsel regarding scheduling the mediation with St. Paul Mercury regarding the Receiver's the FDIC-R's claims against the financial institution bond and coordinate confirming availability of counsel for FDIC-R (.3).	0.30	79.50	KDM
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[Asset analysis and recovery] Correspondence and phone conference with Venezuela counsel regarding status of efforts to sell farms and negotiations with Lwis.	0.40	106.00	MDV
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[Asset analysis and recovery] (Zegalia) (Reduced time) Draft notice of deposition and document request.	0.40	60.00	MJS
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[Asset analysis and recovery] (Nelson Mullins) (No charge) Finalize exhibits to Confidential Settlement Conference Statement and submit to Judge for review.	0.80	0.00	pl
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Aug-26-15	[Asset analysis and recovery] (Bond) Exchange emails with special insurance counsel regarding availability of counsel for FDIC-R for mediation with St. Paul Mercury regarding the Receiver's the FDIC-R's claims	0.20	53.00	KDM
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against the financial institution bond and discuss other possible dates for the mediation (.2).

[Asset analysis and recovery] (Zegalia Clawback) Review and revise Notice of Taking Deposition Duces Tecum and incorporated document request and coordinate scheduling deposition with opposing counsel.	0.30	79.50	KDM
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[Asset analysis and recovery] Exchange emails and telephone calls with AUSA regarding the forensic accountant, the hourly rates of all professionals at his firm, and the retention by the AUSA for purposes of the restitution hearing (.2); exchange emails with forensic accountant regarding same (.2); review document from forensic accountant and forward to AUSA with explanation for purposes of restitution hearing (.2).	0.60	159.00	KDM
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[Asset analysis and recovery] (Nelson Mullins) Research admissibility of FDIC public statements, press releases, balance sheet summary (1.0); Contact FDIC public affairs office and legal division in Dallas regarding Tax Certificate (.4).	1.40	371.00	BAJ
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[Asset analysis and recovery] (Zegalia) Revise notice of deposition duces tecum to include more requests for documents.	0.30	45.00	MJS
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Aug-27-15 [Asset analysis and recovery] Telephone call with Venezuelan counsel regarding status and strategy.	0.50	132.50	MME
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[Asset analysis and recovery] (Nelson Mullins) Review outline prepared by co-counsel regarding Ratner deposition.	0.50	132.50	GFG
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[Asset analysis and recovery] Emails and telephone calls with AUSA regarding various issues related to the restitution hearing (.3); exchange emails with forensic accountant regarding the investor analyses and the restitution hearing (.3).	0.60	159.00	KDM
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	[Asset analysis and recovery] (Nelson Mullins) Work on summary judgment motion and memorandum of law in support.	3.50	927.50	BAJ
	[Asset analysis and recovery] (Nelson Mullins) Begin drafting statement of facts in support of motion for summary judgment.	0.40	106.00	BAJ
	[Asset analysis and recovery] Review documents from Venezuela (.2); Phone conference with Venezuela counsel (.4).	0.60	159.00	MDV
	[Asset analysis and recovery] (Zegalia) (Reduced time) Revise notice of taking deposition duces tecum to include definitions and instructions (.4); email opposing counsel regarding possible deposition dates (.1).	0.30	45.00	MJS
	[Asset analysis and recovery] Email from Aubrey Lee Price regarding investments in Longtop Financial (.1).	0.10	15.00	MJS
Aug-28-15	[Asset analysis and recovery] Follow up on status of proof of claim against estate of Longtop Financial and efforts to locate information or documents regarding Price's investment with that company, receive report from M. Spencer regarding same, and strategize regarding filling out and submitting proof of claim form (.3); emails from and to counsel for FDIC-R regarding information and documents regarding MB&T and review those documents (.2).	0.50	132.50	KDM
	[Asset analysis and recovery] (Zegalia) Phone call to opposing counsel regarding deposition.	0.10	15.00	MJS
	[Asset analysis and recovery] Search documents for possible Longtop Financial Technologies statements needed for proof of claim form.	0.30	45.00	MJS
	[Asset analysis and recovery] Review emails from claimants regarding questions about the Proof of Claim form and respond.	0.30	22.50	pl

Aug-31-15	[Asset analysis and recovery] Review filled out claim form to be submitted in Longtop Financial matter, coordinate having Receiver review and sign it, and discuss procedure for filing the claim.	0.20	53.00	KDM
	[Asset analysis and recovery] (Nelson Mullins) Review objections from Defendants regarding request for production as to deposition of Ian Ratner (.3); review of documents produced (1.0).	1.30	344.50	BAJ
	[Asset analysis and recovery] (Nelson Mullins) (No charge) Review transcript of deposition of Ivan Garces.	1.40	0.00	BAJ
	[Asset analysis and recovery] Complete claims form for Longtop Financial on behalf of receivership estate.	0.50	75.00	MJS
	[Asset analysis and recovery] (No charge) Finalize and file Receiver's 12th Fee Application and exhibits.	0.70	0.00	pl
Sep-01-15	[Asset analysis and recovery] (Nelson Mullins) Meet with counsel in preparation for settlement conference and rebuttal expert deposition.	1.20	318.00	MME
	[Asset analysis and recovery] (Nelson Mullins) Review rebuttal report of Ian Ratner.	0.40	106.00	PFV
	[Asset analysis and recovery] (Nelson Mullins) Review question analysis regarding deposition of Mr. Ratner (.4) review time line regarding factual background (.4) Review source material cited by Mr. Ratner (.9).	1.70	450.50	PFV
	[Asset analysis and recovery] (Nelson Mullins) Conference with team to prepare for deposition of Mr. Ratner and case law regarding permitted expert testimony and work on additional deposition preparation.	4.50	1,192.50	PFV
	[Asset analysis and recovery] (Bond Claim) Emails with special insurance counsel regarding the scheduling of the mediation of	0.20	53.00	KDM

the Receiver's and the FDIC-R's claims against the financial institution bond and strategize regarding same (.2).

[Asset analysis and recovery] (Nelson Mullins) Assist P. Valori in preparation for deposition of Ian Ratner.	3.30	874.50	BAJ
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[Asset analysis and recovery] (Zegalia) Phone call with opposing counsel regarding requested bank documentation.	0.20	30.00	MJS
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Sep-02-15	[Asset analysis and recovery] (Nelson Mullins) Meet with counsel in preparation for rebuttal expert deposition and attending rebuttal expert deposition.	3.20	848.00	MME
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[Asset analysis and recovery] (Nelson Mullins) (Reduced time) Travel to Atlanta (2.5 no charge) additional preparation for (.5) and attend (2.8) deposition of Mr. Ratner regarding rebuttal report.	3.30	874.50	PFV
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Sep-03-15	[Asset analysis and recovery] (Nelson Mullins) Meet with counsel in preparation for settlement conference and attend settlement conference.	1.20	318.00	MME
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[Asset analysis and recovery] (Nelson Mullins) Review email regarding liability issues (.1); meet with Receiver to prepare for conference and attend settlement conference (1.2).	1.30	344.50	PFV
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[Asset analysis and recovery] (Evanston claim) Review letter from counsel for Evanston requesting additional documentation of the Receiver's claim and an explanation regarding why its initial offer is reasonable (.1); exchange emails with special insurance counsel regarding same, and schedule a call with counsel to discuss same (.2); review draft complaint against Giardina and Zegalia on behalf of MAM for purposes of responding to carrier's letter (.2).	0.50	132.50	KDM
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[Asset analysis and recovery] Review	0.60	159.00	MDV
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correspondence from Lwis' counsel (.3);
correspondence with Venezuela counsel
regarding status of efforts to sell farms and
harvests (.3).

Sep-04-15	[Asset analysis and recovery] Follow up with AUSA's office regarding status of restitution hearing and whether testimony from forensic accountant will be necessary and exchange emails with forensic accountant regarding same.	0.30	79.50	KDM
	[Asset analysis and recovery] (Nelson Mullins) Revise motion for summary judgment and continue drafting memorandum in support thereof, finalizing outline for same.	4.70	1,245.50	BAJ
Sep-08-15	[Asset analysis and recovery] (Nelson Mullins) Conference with Barbara Junge regarding status and Motion for Summary Judgment.	0.20	53.00	PFV
	[Asset analysis and recovery] Email from AUSA regarding Price's agreement to the identity of a majority of the investors and amounts of their losses and efforts to reach an agreement with Price on all investors and losses so that testimony from forensic accountant is not necessary (.1); exchange emails with forensic accountant regarding same and certain related issues (.2); review letter from U.S. DOJ regarding the upcoming restitution hearing and provide information to certain investors inquiring about same (.3).	0.60	159.00	KDM
	[Asset analysis and recovery] (Bond Claim) Review emails with counsel for FDIC-R regarding the mediation of the claim against the financial institution bond of the Receiver and the FDIC-R and exchange emails with special insurance counsel regarding same.	0.20	53.00	KDM
	[Asset analysis and recovery] (SCAN Action) Follow up with prospective counsel for Garcia and Archila regarding his representation of those Defendants and filing of a response to the Complaint.	0.20	53.00	KDM

	[Asset analysis and recovery] Review update regarding meetings in Venezuela regarding negotiations for sale of property and for settlement with Osama Lwis and correspondence with Venezuela counsel regarding same.	0.40	106.00	MDV
Sep-09-15	[Asset analysis and recovery] (SCAN Action) Telephone calls from and to prospective counsel for Archila and Garcia regarding previous settlement negotiations, the status of the sale of the Longboat Key property and the amount the Estate received from the sale, his filing of answer to prevent a default against his clients, and possible continued settlement negotiations.	0.40	106.00	KDM
	[Asset analysis and recovery] (Nelson Mullins) Review materials for summary judgment, continue drafting motion, assemble pertinent exhibits.	3.60	1,350.00	BAJ
Sep-10-15	[Asset analysis and recovery] Review e-mails from Venezuelan counsel regarding status (.4); telephone call with Venezuelan counsel regarding status and strategy (.5).	0.90	238.50	MME
	[Asset analysis and recovery] (Zegalia) Phone call to opposing counsel requesting documents related to transfers.	0.10	15.00	MJS
Sep-11-15	[Asset analysis and recovery] (Nelson Mullins) (No charge) Email regarding brief page length.	0.10	0.00	PFV
	[Asset analysis and recovery] (SCAN Action) Receive notice from the Court regarding the Court's consideration of Defendants' latest request for extension of time to respond to the Complaint based on recent hiring of counsel (.1); coordinate calendaring latest response deadline (.1).	0.20	53.00	KDM
	[Asset analysis and recovery] (Bond Claims) Emails with special insurance counsel regarding the scheduling of the mediation of the Receiver's and the FDIC-R's respective claims against the bond and coordinate	0.20	53.00	KDM

calendarizing the mediation and team members to attend the mediation.

Sep-13-15	[Asset analysis and recovery] (Nelson Mullins) Review and provide comments to counsel regarding motion for summary judgment draft.	0.80	212.00	MME
	[Asset analysis and recovery] (Nelson Mullins) Email with Opposing Counsel.	0.10	26.50	PFV
	[Asset analysis and recovery] Review response to Subpoena regarding L. Lopez account in Miami and strategize with Receiver regarding same.	0.30	79.50	MDV
Sep-14-15	[Asset analysis and recovery] (Nelson Mullins) Review correspondence from Opposing Counsel regarding Motion regarding brief length and draft response (.1); conference with Barbara Junge and Receiver regarding litigation planning (.1).	0.20	53.00	PFV
	[Asset analysis and recovery] (Nelson Mullins) Continue drafting memorandum of law in support of summary judgment, finalize sections on elements.	5.90	2,212.50	BAJ
	[Asset analysis and recovery] (Zegalia) Phone call to opposing counsel requesting further financial documentation.	0.10	15.00	MJS
Sep-16-15	[Asset analysis and recovery] Review mediation agreement and related materials (.2); respond to counsel regarding same(.2).	0.40	106.00	MME
	[Asset analysis and recovery] (Nelson Mullins) Conference with Barbara Junge regarding Summary Judgment motion and Daubert motions.	0.30	79.50	PFV
	[Asset analysis and recovery] (Fee Applications) (No charge) Review Order granting 12th Fee Application, discuss with team members, and coordinate disbursing funds to professionals pursuant to Order (.2).	0.20	0.00	KDM

	[Asset analysis and recovery] (Bond) Review letter, agreement and rate sheet for mediator and emails from counsel for FDIC-R and exchange emails with special insurance counsel and Receiver regarding approval of the proposed terms and rates for the mediation (.2); exchange emails with special insurance counsel regarding discussions with counsel for FDIC-R regarding the mediation (.1).	0.30	79.50	KDM
	[Asset analysis and recovery] (SCAN action) Follow up with counsel for Garcia and Archila regarding responding to the Complaint and engaging in settlement negotiations and/or mediation, and exchange emails regarding same (.3).	0.30	79.50	KDM
Sep-17-15	[Asset analysis and recovery] (Nelson Mullins) Continue drafting summary judgment motion.	3.90	1,462.50	BAJ
	[Asset analysis and recovery] (Nelson Mullins) Review and make suggestions on motion for summary judgment for B. Junge.	0.60	90.00	MJS
Sep-18-15	[Asset analysis and recovery] (Nelson Mullins) Continue revising summary judgment motion and make notes for response to Defendants' anticipated summary judgment motion.	4.80	1,800.00	BAJ
	[Asset analysis and recovery] (Nelson Mullins) (No charge) Edit portions of motion for summary judgment.	0.60	0.00	MJS
Sep-21-15	[Asset analysis and recovery] E-mail with counsel in Venezuela regarding status and strategy.	0.40	106.00	MME
	[Asset analysis and recovery] Review letter from Claims Administrator in the Longtop Financial Technologies matter for the claim we submitted and discuss with team members whether additional documentation is necessary for processing of our claim (.2).	0.20	53.00	KDM

	[Asset analysis and recovery] (Nelson Mullins) Strategize with B. Junge regarding the Motion for Summary Judgment, certain arguments raised therein and applicable case law, and revisions to be made to the motion (.5); review certain documents for purposes of arguments being made in the Motion and discuss same with B. Junge (.2).	0.70	185.50	KDM
	[Asset analysis and recovery] (Zegalia) Email with opposing counsel regarding bank documentation.	0.10	15.00	MJS
	[Asset analysis and recovery] (Reduced time) Confer with B. Junge regarding in pari delicto defense as it applies to Receiver's claims (.8); review and edit portions of motion for summary judgment (1.4).	1.80	270.00	MJS
Sep-22-15	[Asset analysis and recovery] (Nelson Mullins) Additional conference regarding Motion for Summary Judgment and Daubert motions.	0.40	106.00	PFV
	[Asset analysis and recovery] (Zegalia Clawback) Receive report from M. Spencer regarding the status of Zegalia's production of documents showing where the funds he received from the Receivership Defendants were transferred for purposes of settlement negotiations and strategize regarding obtaining the necessary documents and the need to extend all deadlines to facilitate settlement negotiations (.2); coordinate obtaining agreement to the filing of a joint motion to extend all deadlines or abate the action pending settlement negotiations, receive report regarding counsel's agreement, and coordinate preparation of joint motion (.1); review and revise joint motion and coordinate making final revisions and filing with the Court (.2).	0.50	132.50	KDM
	[Asset analysis and recovery] Exchange emails with AUSA regarding Price's cooperation with the Receiver and the actions brought on behalf of the Estate (.3).	0.30	79.50	KDM

	[Asset analysis and recovery] (Nelson Mullins) Revise summary judgment draft, review and revise statement of facts, edit and revise arguments to be made in reply brief.	8.60	3,225.00	BAJ
	[Asset analysis and recovery] Strategize with Receiver regarding costs related to Farms.	0.20	53.00	MDV
	[Asset analysis and recovery] (Zegalia) (Reduced time) Phone call with opposing counsel regarding bank documentation (.2); confer with K. Murena regarding discovery requests (.2); phone call with opposing counsel regarding request for extension of time (.1); draft joint motion to extend deadlines (.8);	0.80	120.00	MJS
Sep-23-15	[Asset analysis and recovery] Review memorandum regarding property and farm operations in Venezuela, including sale/assignment issues (.4); telephone call with Venezuelan counsel regarding same (.4); e-mail with insurance counsel regarding mediation (.2).	1.00	265.00	MME
	[Asset analysis and recovery] (Nelson Mullins) Conference with Guy Giberson and Receiver regarding Daubert motions and case status.	0.20	53.00	PFV
	[Asset analysis and recovery] (Zegalia Clawback) Provide input regarding the preparation of the proposed Order granting Joint Motion for extension of all deadlines to facilitate settlement negotiations, review and revise proposed Order, make further revisions to the Joint Motion and coordinate filing it with the Court (.3).	0.30	79.50	KDM
	[Asset analysis and recovery] (Bond) Review emails between special insurance counsel and counsel for St. Paul Mercury regarding the mediation of the claims of the Receiver and the FDIC-R and various procedural and logistical matters and exchange emails with special insurance counsel regarding same (.3).	0.30	79.50	KDM
	[Asset analysis and recovery] Review emails with counsel or FDIC-R, exchange emails with	0.30	79.50	KDM

team members regarding the production of certain documents in the Receiver's possession to counsel for FDIC-R and whether they are subject to any confidentiality order, and discuss same with team members (.3).

[Asset analysis and recovery] (Nelson Mullins) Review statement of facts and revise argument section of summary judgment motion.	4.10	1,086.50	BAJ
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[Asset analysis and recovery] (Zegalia) (Reduced time) Revise joint motion to extend deadlines (.9); draft proposed order (.4); email opposing counsel regarding joint motion (.1).	1.00	150.00	MJS
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[Asset analysis and recovery] (Reduced time) Review complete draft of summary judgment motion for B. Junge and make appropriate edits (1.6); confer with B. Junge about changes to be made to summary judgment motion (.6).	1.50	225.00	MJS
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Sep-24-15	[Asset analysis and recovery] (Nelson Mullins) Review and revise Memorandum of Law in support of Motion for Summary Judgment and meet with counsel regarding same.	2.20	583.00	MME
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[Asset analysis and recovery] Review update from Venezuela counsel and strategize with Receiver regarding same.	0.30	79.50	MDV
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Sep-25-15	[Asset analysis and recovery] (Nelson Mullins) Work on Motion for Summary Judgment and conference with Barbara Junge regarding same.	1.80	477.00	PFV
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[Asset analysis and recovery] (Zegalia Clawback) Review Order granting Joint Motion for extension of all deadlines to facilitate settlement negotiations, coordinate calendaring of new dates and deadlines, and follow up on obtaining from J. Zegalia the documents evidencing his expenditure of the funds he received from the Receivership entities (.2).	0.20	53.00	KDM
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	[Asset analysis and recovery] (Nelson Mullins) Revise summary judgment memorandum of law and finalize section on defenses.	5.70	1,510.50	BAJ
	[Asset analysis and recovery] Correspondence with Venezuela counsel regarding status of negotiations with potential purchaser of farms and Lwis.	0.20	53.00	MDV
Sep-28-15	[Asset analysis and recovery] (Nelson Mullins) Review correspondence regarding Motion to Amend and Summary Judgment deadlines.	0.20	53.00	PFV
	[Asset analysis and recovery] (Nelson Mullins) Email from the Court's law clerk regarding the forthcoming Order staying deadline to file motions for summary judgment pending the Court's ruling on our Motion to amend the complaint and discuss with Receiver (.1); review Order staying deadline, discuss with team members, and coordinate removing current summary judgment motion deadline from calendars (.1).	0.20	53.00	KDM
	[Asset analysis and recovery] (Bond Claim) Email from special insurance counsel regarding the mediation statement for claims of the Receiver and the FDIC-R against the financial institution bond and begin reviewing proposed statement (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] (Nelson Mullins) Revise summary judgment - finalize sections regarding [REDACTED].	7.40	1,961.00	BAJ
Sep-29-15	[Asset analysis and recovery] Telephone call with counsel regarding sale of Venezuela farm and farm issues (.5); review and revise bond mediation statement and mediation preparation documents and discuss same with counsel (.5).	1.00	265.00	MME
	[Asset analysis and recovery] (Bond Claim) Discuss with Receiver her revisions to the Mediation Statement and finish reviewing and revising Mediation Statement (.4); exchange	0.50	132.50	KDM

emails with special insurance counsel regarding our requested revisions to the Statement (.1).

[Asset analysis and recovery] (Scan Action) Review Order directing Receiver to file Request for Clerk's Entry of Default pursuant to Defendants' failure to file a response to the Complaint and discuss with A. Fernandez the Order, updating of Request for Clerk's Entry of Default, and Defendants' latest communications to the Court (.2); review and revise updated Request for Clerk's Entry of Default and coordinate filing it with the Court (.2).	0.40	106.00	KDM
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[Asset analysis and recovery] (Nelson Mullins) Telephone call with Ivan Garces to discuss rebuttal deposition of Ian Ratner.	0.60	159.00	BAJ
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[Asset analysis and recovery] Phone conference with Venezuela counsel regarding negotiations to sell farms and follow up correspondence regarding same (.8); strategize with Receiver regarding negotiations (.2).	1.00	265.00	MDV
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[Asset analysis and recovery] (SCAN) Review order directing Plaintiffs to file motion for clerk's default (0.1); draft motion for clerk's default (0.3).	0.40	60.00	AF
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[Asset analysis and recovery] (Zegalia) Email opposing counsel regarding bank documentation.	0.10	15.00	MJS
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Sep-30-15 [Asset analysis and recovery] (SCAN) Review and revise default motion and discuss same with counsel.	0.50	132.50	MME
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[Asset analysis and recovery] (Scan Action) Exchange emails with Receiver regarding the status of preparation of the Request for entry of clerk's default and discuss with A. Fernandez the final revisions to the Request (.2).	0.20	53.00	KDM
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[Asset analysis and recovery] (Nelson	7.10	1,881.50	BAJ
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Mullins) Revise memorandum of law for summary judgment motion, finalize sections on scope of duty and breach of duty.

[Asset analysis and recovery] Make changes to motion for entry of clerk's default based upon K. Murena's edits.	0.10	15.00	AF
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Oct-01-15	[Asset analysis and recovery] (SCAN Action) Discuss with Receiver the Court's Order directing Receiver to file request for Clerk's entry of default and the revisions to be made to the Motion and the proposed Clerk's entry of default (.1); coordinate having those revisions made, review final version of the Request, and have it filed with the Court (.2).	0.30	79.50	KDM
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[Asset analysis and recovery] (Nelson Mullins) Revise memorandum of law, and continue making additional revisions to statement of facts.	3.80	1,007.00	BAJ
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Oct-02-15	[Asset analysis and recovery] (Nelson Mullins) Research regarding issues regarding [REDACTED].	0.40	106.00	PFV
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[Asset analysis and recovery] (Bond Claim) Emails from and to special insurance counsel regarding the upcoming mediation on the claims against the financial institution bond of the Receiver and the FDIC-R (.1); review various documents related to PFGBI including its Operating Agreement, list of economic interest owners and principals, K-1s issued and other documents and forward to special insurance counsel (.5); telephone calls from and to special insurance counsel regarding same (.3); emails with counsel for FDIC-R and special insurance counsel regarding preparations for the mediation (.2).	1.10	291.50	KDM
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[Asset analysis and recovery] (Scan Action) Strategize with A. Fernandez regarding the amount of damages for purposes of preparing the affidavit of the Receiver in support of the Motion for Final Default Judgment and discuss the evidence in support of those damages, the proceeds from the sale of the Longboat Key	0.30	79.50	KDM
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property, and the possible need for an affidavit from A.L. Price regarding the amounts transferred from the Receivership Entities to SCAN International (.3).

	[Asset analysis and recovery] (Nelson Mullins) Revise memorandum of law and statement of facts; review additional information about Nelson Mullins law firm.	2.50	662.50	BAJ
Oct-04-15	[Asset analysis and recovery] (Bond) Review material to prepare for mediation, including case law and meet with counsel regarding same.	2.50	662.50	MME
Oct-05-15	[Asset analysis and recovery] (Bond) Meet with counsel for FDIC to prepare for mediation (.6); attend mediation (6.0).	6.60	1,749.00	MME
	[Asset analysis and recovery] (SCAN action) Review Clerk's Entry of Default, follow up on status of preparation of Motion for Default Final Judgment and coordinate calendaring deadline to file that Motion as per the Court's order denying Defendants' motion for extension of time and directing receiver to seek default (.2); discuss with A. Fernandez the amount of damages to be attested to in Declaration in support of Motion for Default Final Judgment, the documents supporting those damages, and possible Declaration needed from A.L. Price (.2); work on determining and calculating the fees and costs expended in connection with the Receiver's claims against SCAN and its principals (.7).	1.10	291.50	KDM
	[Asset analysis and recovery] (Bond Action) Exchange emails with Receiver and special insurance counsel regarding status of mediation on the claims of the Receiver and the FDIC-R against the financial institution bond.	0.20	53.00	KDM
	[Asset analysis and recovery] (Nelson Mullins) (Reduced time) Further develop annotated index of exhibits (2.4); discuss with co-counsel exhibit numbering system for additional exhibits (.1); continue revising	5.00	1,325.00	BAJ

memorandum of law and statement of facts
(4.9).

[Asset analysis and recovery] (SCAN) Review clerk's entry of default and discuss with K. Murena damages to be attested to in affidavit in support of default final judgment.	0.10	15.00	AF
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Oct-06-15	[Asset analysis and recovery] (Evanston Claim) (Reduced time) Multiple emails with special insurance counsel and G. Giberson regarding the Receiver's claims against Giardina and Zegalia that are covered by the Evanston Insurance policy of MAM and strategy for letter to carrier demanding policy proceeds sand responding to their letter asserting policy exclusions and evidence in support of claim and coordinate scheduling call to discuss same (.3); telephone call with special insurance counsel and G. Giberson regarding same (.9); gather and review documents in support of the Receiver's claims and send to special insurance counsel for purposes of preparation of letter to carrier (.4 - reduced); review portions of the draft Complaint and send to special insurance counsel with recommendations for the letter to the carrier (.4 - reduced); strategize with Receiver regarding demand letter to Evanston and status of FDIC-R's demand letter (.1).	2.10	556.50	KDM
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[Asset analysis and recovery] (SCAN Action) (Reduced time) Continue working on determining the amount of damages for purposes of the Affidavit of Receiver in support of Motion for Default Final Judgment (1.5 – reduced); discuss with A. Fernandez the revised amount of damages to be attested to in Affidavit of Receiver in support of Motion for Default Final Judgment (.2); exchange emails with A. Fernandez regarding Clerk's failure to enter default against one of the principals of SCAN, strategize regarding resolving issue, and coordinate preparation of Request for Clerk's entry of default against that one principal (.3).	2.00	530.00	KDM
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	[Asset analysis and recovery] (Bond claim) Discuss with the Receiver the outcome of the mediation of the Receiver's and the FDIC-R's claims against the financial institution bond and strategy for negotiating settlement with St. Paul Mercury and pursuing claims through litigation if necessary (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] (Nelson Mullins) (No charge) Identify additional exhibits, add to annotated index.	4.10	0.00	BAJ
	[Asset analysis and recovery] (SCAN) Conference with K. Murena regarding calculation of damages (0.2); draft motion for entry of default final judgment (0.6).	0.80	120.00	AF
Oct-07-15	[Asset analysis and recovery] (Evanston Claim) Telephone calls from and to special insurance counsel regarding certain facts to be presented in letter to Evanston demanding policy limits and responding to carrier's exclusions letter (.4); review certain correspondence with the carrier and documents evidencing involvement of Giardina and Zegalia and send information to special insurance counsel (.5).	0.90	238.50	KDM
	[Asset analysis and recovery] (SCAN) Strategize with A. Fernandez regarding whether to file an Amended Request for Entry of Clerk's Default against all Defendants or a second Request as to the two Defendants not included in the first Entry of Default (.1); strategize regarding the statements to be in support of Motion for Default Final Judgment (.2); exchange emails with Receiver regarding status of Entry of Default, preparation of Motion for Default Final Judgment, and Affidavit in support (.1).	0.40	106.00	KDM
	[Asset analysis and recovery] Correspondence with Venezuela counsel regarding negotiations with Lwis and instructions regarding same.	0.30	79.50	MDV
	[Asset analysis and recovery] (SCAN) (No charge) Conference with K. Murena regarding	0.20	0.00	AF

entry of clerk's default and amended motion for clerk's default (0.2).

Oct-08-15	[Asset analysis and recovery] (SCAN Action) (No charge) Receive report regarding instructions from the Clerk's office regarding need to vacate Clerk's Default and re-file the Receiver's request so that correct Default can be entered (.1); review and revise Motion to Vacate Entry of Default and proposed Order granting that Motion and coordinate filing it with the Court (.2).	0.30	0.00	KDM
	[Asset analysis and recovery] (Evanston Claim) Email from special insurance counsel regarding detailed letter responding to Evanston's coverage defenses and strategy for pursuing the Receiver's claims and forwarding draft of letter (.1); begin reviewing and revising draft letter (.9).	1.00	265.00	KDM
	[Asset analysis and recovery] (Nelson Mullins) Revise statement of facts.	2.40	636.00	BAJ
	[Asset analysis and recovery] (SCAN) Review and revise motion to vacate entry of default and proposed order.	0.30	45.00	AF
	[Asset analysis and recovery] (SCAN) (No charge) Prepare draft Motion to Vacate Request for Clerk's Entry of Default and Clerk's Default and Proposed Order regarding same for attorney K. Murena's review.	1.10	0.00	pl
Oct-09-15	[Asset analysis and recovery] (Evanston Claim) Continue revising detailed letter drafted by special insurance counsel responding to Evanston's coverage defenses (.7); forward revised draft of letter to special insurance counsel and coordinate making final revisions and exchange emails with counsel regarding same (.3).	1.00	265.00	KDM
	[Asset analysis and recovery] Send instructions to Venezuela counsel regarding negotiations with Lwis.	0.20	53.00	MDV

	[Asset analysis and recovery] (Zegalia) Phone call to opposing counsel regarding discovery.	0.10	15.00	MJS
Oct-13-15	[Asset analysis and recovery] Meet with Venezuelan counsel regarding status and strategy.	1.00	265.00	MME
	[Asset analysis and recovery] (SCAN Action) Review Order vacating Clerk's Entry of Default and coordinate finalizing another Motion for entry of Default to include all Defendants (.1); review Motion and proposed Order and coordinate making final revisions and filing it with the Court (.2); discuss with Receiver the status of obtaining a Clerk's Default and the preparation of the Motion for Final Judgment of Default and her Declaration in support thereof and follow up with A. Fernandez regarding preparation of Motion and Declaration (.2).	0.50	132.50	KDM
	[Asset analysis and recovery] Draft Motion and Order to Approve Sale of Venezuela Farm Property rights and interest and exchange emails with receivership team regarding same.	3.50	927.50	CP
	[Asset analysis and recovery] Correspondence with Venezuela counsel (.3); meet with Venezuela counsel De Sola and Receiver regarding status of efforts to sell farms (1.0); review documents regarding farm negotiations (.3); strategize regarding Motion to Approve Settlement (.2).	1.80	477.00	MDV
	[Asset analysis and recovery] (SAN) (No charge) Review order granting motion to vacate default	0.10	0.00	AF
	[Asset analysis and recovery] (SCAN) (No charge) Review and revise amended motion for entry of clerk's default (0.2).	0.20	0.00	AF
Oct-14-15	[Asset analysis and recovery] Review and revise motion to approve sale of property rights in Corn Farm and discuss same with counsel.	0.80	212.00	MME

	[Asset analysis and recovery] (Nelson Mullins) (No charge) Conference regarding [REDACTED].	0.30	0.00	PFV
	[Asset analysis and recovery] (SCAN Action) Review Entry of Default against all defendants and coordinate calendaring of deadline to file Motion for Final Default Judgment based on Court's Order directing Receiver to seek default, and follow up with A. Fernandez on status of preparation of Motion (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] (Evanston Claim) Exchange emails with special insurance counsel regarding the final version of the letter responding to Evanston's denial of coverage letter and detailing the bases for the Receiver's claim and review the final version of the letter (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] (Bond Claim) Emails with special insurance counsel and the Receiver regarding following up with mediator for the claims of the Receiver and the FDIC-R against the financial institution bond to obtain St. Paul Mercury's response to our latest settlement offer (.2); further emails with Receiver regarding strategy for negotiating with counsel for St. Paul Mercury and contacting the mediator (.1).	0.30	79.50	KDM
	[Asset analysis and recovery] (SCAN) Review entry of clerk's default against all defendants.	0.10	15.00	AF
Oct-15-15	[Asset analysis and recovery] (Bond Claim) Receive update from special insurance counsel regarding status of scheduling of mediation and following up with counsel for St. Paul Mercury regarding the receipt of letter responding to counsel's letter denying coverage (.1).	0.10	26.50	KDM
	[Asset analysis and recovery] (Evanston Claim) Receive update from special insurance counsel regarding the status of the FDIC-R's demand letter to Evanston (.1).	0.10	26.50	KDM

Oct-16-15	[Asset analysis and recovery] (No charge) Assist M. Visconti regarding requesting expedited relief to sell Yaguarita (.4); Revise expedited motion to sell Yaguarita (.4).	0.80	0.00	MJS
Oct-20-15	[Asset analysis and recovery] (Bond Claim) Emails with special insurance counsel regarding recent communications with counsel for St. Paul Mercury and with counsel for the FDIC-R regarding the claims against the bond and the strategy for pursuing those claims through litigation.	0.20	53.00	KDM
Oct-21-15	[Asset analysis and recovery] (Zegalia) Email opposing counsel regarding bank documentation.	0.10	15.00	MJS
Oct-22-15	[Asset analysis and recovery] (Zegalia) Revise subpoena duces tecum and begin drafting interrogatories.	0.40	60.00	MJS
Oct-23-15	[Asset analysis and recovery] Review Order granting motion to approve sale of corn farm and discuss with team members whether the Order is sufficient for purposes of the sale in Venezuela or whether an amended Order is necessary.	0.20	53.00	KDM
	[Asset analysis and recovery] Review Court Order Granting Motion to Sell Farm.	0.10	26.50	MDV
Oct-25-15	[Asset analysis and recovery] (Nelson Mullins) Email regarding expert transcript.	0.20	53.00	PFV
Oct-26-15	[Asset analysis and recovery] (Zegalia Action) Review and revise document request in Notice of Deposition Duces Tecum and coordinate having M. Spencer finalize and clear date and time with Zegalia's counsel and revise and serve First Set of Interrogatories (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] (Evanston Claim) Exchange emails with special insurance counsel regarding the response from counsel for Evanston to our letter responding to his denial of coverage letter and review his	0.20	53.00	KDM

response letter seeking the review of all non-privileged documents of the Estate (.2).

Oct-27-15	[Asset analysis and recovery] (Evanston Claim) Review further emails with counsel for Evanston requesting review of all of the Estate's documents and exchange emails with special insurance counsel regarding the form of the documents, the privileged nature of many documents, and the need to obtain a confidentiality order before we could produce most of the documents (.3).	0.30	79.50	KDM
	[Asset analysis and recovery] (Reduced time) Research regarding statute of limitations for fraudulent transfer actions under Georgia UFTA (.8); review list of potential net winners and forensic analysis for same and exchange emails with M. Spencer regarding tolling agreements (1.3);	2.10	556.50	CP
	[Asset analysis and recovery] Review status of tolling agreement for potential net-winner (.1); phone call to attorney regarding request for signed tolling agreement for potential net-winner (.2)	0.30	45.00	MJS
	[Asset analysis and recovery] Phone call with counsel for potential net-winner regarding tolling agreement.	0.20	30.00	MJS
Oct-28-15	[Asset analysis and recovery] (Evanston Claim) Exchange emails with special insurance counsel regarding issues related to production of documents to counsel for Evanston for purposes of evaluating our claims and responses to their asserted bases for denial of coverage and reschedule call to discuss same (.2); review and determine the scope of document productions to Defendants in different litigation matters and the Confidentiality Orders that authorized those productions of confidential documents for purposes of determining the appropriate method of production to Evanston's counsel (.3).	0.50	132.50	KDM

Oct-29-15	[Asset analysis and recovery] Review demand letter and draft demand and provide comments to counsel.	1.00	265.00	MME
	[Asset analysis and recovery] (Nelson Mullins) Review order on motion for leave to amend and email regarding same and draft response.	0.30	79.50	PFV
	[Asset analysis and recovery] (Nelson Mullins) (No charge) Review Order granting Motion for leave to amend the Complaint, discuss with team members, and calendar the deadlines to file Amended Complaint, motions to reopen discovery and motions for extension of time to file summary judgment motions (.2).	0.20	0.00	KDM
	[Asset analysis and recovery] (Evanston Action) Exchange emails with special insurance counsel regarding strategy for document production to counsel for Evanston and related matters and reschedule call to further discuss same.	0.20	53.00	KDM
	[Asset analysis and recovery] Exchange emails with counsel for the FDIC-R and review letter from counsel regarding the Assignment of the FDIC-R's rights regarding deficiency judgment against SCAN and its principals to the Receiver pursuant to the real estate Agreement between the FDIC-R and the Receiver (.2); review that Agreement and begin reviewing the proposed Assignment Agreement (.1).	0.30	79.50	KDM
	[Asset analysis and recovery] (Zegalia) Email opposing counsel regarding deposition dates.	0.10	15.00	MJS
Oct-30-15	[Asset analysis and recovery] Review and respond to e-mail correspondence regarding issues in Venezuela with the Corn Harvest and purchase agreement (.6); review and execute agreement regarding FDIC assignment of certain claims regarding property and note on Longboat Key property and meet with counsel regarding same (.3).	0.90	238.50	MME

	<p>[Asset analysis and recovery] (SCAN Action) Continue reviewing Assignment Agreement to be entered into by the FDIC-R and the Receiver for purposes of assigning the FDIC-R's rights to collect from SCAN and its principals the deficiency from the sale of the Longboat Key property (.2); present Agreement to the Receiver to execute and send executed copy to counsel for FDIC-R to have FDIC-R execute and return so Receiver can collect deficiency amount from SCAN and its principals (.2); exchange emails with counsel regarding same (.1); provide information to A. Fernandez regarding the Assignment for purposes of preparing Receiver's Declaration in support of Motion for Default Final Judgment (.1).</p>	0.60	159.00	KDM
	<p>[Asset analysis and recovery] (Bond Claim) Exchange emails with counsel for FDIC-R and special insurance counsel regarding the status of communications with counsel for St. Paul Mercury regarding the scheduling of a mediation and the FDIC-R's intention to participate or pursue its claim through litigation (.2).</p>	0.20	53.00	KDM
	<p>[Asset analysis and recovery] (Evanston Claim) Telephone call with special insurance counsel regarding the production of documents to counsel for Evanston, issues regarding confidentiality, obtaining from Evanston's counsel a more narrow list of documents that seek, and the mechanism and logistics of the production (.3); review letter from special insurance counsel to Evanston's counsel regarding same (.1).</p>	0.40	106.00	KDM
	<p>[Asset analysis and recovery] (Zegalia action) Revise Notice of Taking Deposition Duces Tecum (.3).</p>	0.30	45.00	MJS
Aug-10-15	<p>[Business operations] Review tax Notice from the IRS for PFGIA, coordinate calendaring of deadline to pay taxes, send Notice to tax consultant for advice regarding payment, and discuss with the Receiver (.5).</p>	0.50	132.50	KDM

Aug-25-15	[Business operations] Exchange multiple emails with tax consultant regarding information and documents required for purposes of preparation of tax returns, provide requested information and coordinate gathering and providing certain documentation (.4).	0.40	106.00	KDM
Sep-08-15	[Business operations] Confirm deadline to pay back taxes for PFGIA (.1); confer with tax consultant regarding same (.2).	0.30	79.50	KDM
Sep-10-15	[Business operations] Telephone call to IRS regarding its Notice of tax liability to PFGIA, the Receivership Defendants, the receivership and the claims process (.4).	0.40	106.00	KDM
Sep-11-15	[Business operations] Follow up telephone call to IRS regarding its notice of tax debt to PFGIA and provide information to IRS regarding the status and nature of that company, its principals and their contact information, the status and nature of the Receivership, and the claims process (.5); exchange emails with tax consultant regarding call with IRS and the tax notice (.2).	0.70	185.50	KDM
Oct-08-15	[Business operations] Review proposed Power of Attorney for tax consultant for purposes of 2014 tax returns for the Estate and review the draft tax returns, exchange emails with tax consultant regarding same, and present to the Receiver for review and execution (.3); confirm execution by the Receiver and coordinate mailing tax returns (.1).	0.40	106.00	KDM
Oct-27-15	[Business operations] Review letter and invoices from company serving as registered agent in Georgia for certain Receivership Entities, discuss with M. Dhanji regarding paying the invoice and continuing the service, and coordinate payment and renewal.	0.20	53.00	KDM
Aug-02-15	[Case administration] (No charge) Review and revise invoices of the Receiver and lead counsel for purposes of the Fee Application.	4.00	0.00	KDM

Aug-03-15	[Case administration] (No charge) Emails with counsel for SEC regarding proposed revisions to the Motion to approve contingency fee arrangement for action against MCBI Ds and Os (.2); exchange emails with special insurance counsel regarding proposed contingency fee amount and discuss with Receiver the status of the SEC's approval of the contingency fee amount (.2).	0.40	0.00	KDM
	[Case administration] (No charge) Review and revise invoices of the Receiver and lead counsel for purposes of the Fee Application.	3.00	0.00	KDM
Aug-04-15	[Case administration] (No charge) Email with counsel for SEC regarding the SEC's approval of the proposed contingency fee percentage for purposes of the Receiver's action against the 2012 directors and officers of MCBI, discuss with Receiver and prepare and send emails to special insurance counsel and local counsel in the S.D. Ga. Regarding the proposed contingency fee amount to be split among the three firms based on the number of hours each firm spends on the matter (.2); revise the Motion to approve contingency fee arrangement and the proposed Order and send drafts to the Receiver and local counsel for approval (.3); discuss with Receiver certain revisions to be made to the Motion, revise the Motion and send draft of Motion and proposed Order to special insurance counsel for review and approval, and exchange emails with special insurance counsel regarding same (.2).	0.70	0.00	KDM
Aug-07-15	[Case administration] Exchange multiple emails with local counsel in the S.D. Ga. Regarding withdrawing as counsel for the Receiver for all matters and potential attorneys who could substitute in as local counsel (.2); exchange emails with Receiver regarding same and possible replacement counsel (.2); telephone calls to potential replacement local counsel for purposes of selecting local counsel in the S.D. Ga. and report to Receiver efforts to locate replacement counsel (.5).	0.90	238.50	KDM

Aug-10-15	[Case administration] (No charge) Review and revise invoices.	2.50	0.00	MME
	[Case administration] Telephone call with Venezuelan counsel regarding murder of counsel and status of situation (.4); telephone call with investigator regarding same (.2); meeting with counsel regarding same (.2).	0.80	212.00	MME
Aug-11-15	[Case administration] Emails from and to counsel for SEC regarding further revisions to be made to Motion to approve contingency fee arrangement for counsel, special insurance counsel and local counsel for a particular litigation and the need to employ substitute local counsel in the S.D. Ga. (.2); review CV of proposed substitute local counsel in the S.D. Ga. and revise Application to employ such counsel and proposed Order granting Application (.3); prepare and send email counsel for SEC forwarding Application, proposed Order and CV of proposed substitute counsel with explanation regarding the experience and qualifications of counsel (.2).	0.70	185.50	KDM
Aug-12-15	[Case administration] Email from and to counsel for SEC regarding proposed substitution of local counsel in the S.D. Ga. (.1); discuss with Receiver proposed local counsel's prior representations and his experience (.1); revise and finalize Application to employ substitute local counsel in the S.D. Ga. and proposed Order and coordinate it with the Court (.3); discuss with Receiver SEC's consent to latest revision to Motion to approve contingency fee arrangement for certain litigation, revise and finalize that Motion and proposed Order to include language suggested by counsel for SEC, and coordinate filing it with the Court (.4).	0.90	238.50	KDM
Aug-13-15	[Case administration] Review Order granting Order approving the claims process, discuss with Receiver and coordinate gathering addresses of investors to send the claims packages to (.4); emails with counsel for Genworth regarding the claims process and the allowance of Genworth's claim pursuant to the	0.60	159.00	KDM

Court's Order approving the settlement with Genworth (.2).

Aug-17-15	[Case administration] Meet with counsel regarding status for claims process and distribution.	0.20	53.00	MME
	[Case administration] Follow up on calendaring of various deadlines related to the claims process based on the date the Court entered the Order approving the claims process and confirm certain deadlines (.2); coordinate having team members confirm various addresses of claimants and discuss with certain investors who received net gains the entry into tolling agreement and participation in the claims process (.2); discuss with Receiver and certain team members the logistics and procedures of the claims process and the resources and staff to be utilized in connection therewith (.2); review Order granting Application to employ substitute counsel in S.D. Ga. and Order granting Motion to approve contingency fee arrangement for the action to be filed in the S.D. Ga., discuss with Receiver, and prepare and send emails to substitute local counsel and prior local counsel forwarding and explaining the two Orders (.2).	0.80	212.00	KDM
Aug-19-15	[Case administration] Telephone call to investor to discuss her inquiries regarding the status of the receivership, pending litigation matters, litigation matters to be commenced, the outcome of concluded litigation matters, the agreement with the FDIC-R, the claims administration process, the expected distributions, the administrative expenses of the estate, and related matters (.4); review and finalize the Legal Notice of claims process and Proof of Claim form to confirm that all information, deadlines and dates were properly calculated based on date Court entered Order approving claims process and coordinate sending out Claims Package to all investors and creditors (.6); continue working with team members on confirming addresses and other contact information of investors and creditors for purposes of sending out Claims Packages	2.70	715.50	KDM

(.8); work on various logistical and procedural issue in preparation for the claims process (.9).

Aug-21-15	[Case administration] Review receivership website to confirm that certain recent Court Orders are posted and gather additional recent Orders and forward to website manager to be posted (.2); exchange emails with website manager regarding same and review website to confirm that all important recent Orders are posted (.2).	0.40	106.00	KDM
	[Case administration] (No charge) Coordinate preparation of Fee Application and coordinate confirming that we have obtained all invoices from all professionals for the Application Period (.2).	0.20	0.00	KDM
Aug-23-15	[Case administration] (No charge) Review and revise July invoice of the Receiver and lead counsel.	2.80	0.00	KDM
Aug-24-15	[Case administration] (No charge) Coordinate making further revisions to the July invoice of the Receiver and lead counsel and sending it to the Receiver for final review and revisions (.2); discuss with M. Spencer certain information and descriptions to be included in Receiver's 12th Fee Application and following up with other counsel for the Receiver to obtain all invoices to be included in the Fee Application (.2).	0.40	0.00	KDM
Aug-25-15	[Case administration] (No charge) Follow up on status of preparation of the Receiver's 12th Interim Fee Application, provide guidance to M. Spencer for preparation of same, and coordinate following up with certain counsel to obtain July invoices and confirm whether they provided services during the Application Period (.3); exchange emails with forensic accountant regarding the July invoice, work on resolving issue, and coordinate revising Fee Application accordingly (.2).	0.50	0.00	KDM
	[Case administration] Email from investor regarding the Nelson Mullins case, issues related to the FDIC-R and its claim against the	0.30	79.50	KDM

	Estate, and various other matters and prepare email responding to her inquiries.			
	[Case administration] (No charge) Draft 12th fee application	3.10	0.00	MJS
Aug-26-15	[Case administration] (No charge) Review and revise July invoice.	1.20	0.00	MME
	[Case administration] (No charge) Continue drafting and revise 12th fee application.	2.00	0.00	MJS
Aug-27-15	[Case administration] (No charge) Review and revise fee application.	1.00	0.00	MME
	[Case administration] (No charge) Work on revising and finalizing the invoices of the Receiver and her lead counsel and calculating the amount of the discount provided, and coordinate inserting into the Receiver's 12th Fee Application the amount of fees and costs requested and the discount provided (1.4); work with team members on revising and finalizing the Fee Application (1.1); review, revise and finalize the proposed Order granting the Fee Application (.3); discuss with the Receiver the final revisions and additions made to the Fee Application and proposed Order, the amount of funds in the Estate and the reserves maintained for the initial distribution to allowed claimants and the hold backs from previous fee applications (.2); prepare and send email to counsel for SEC forwarding draft of Fee Application and all Exhibits and providing brief explanation regarding the fees and costs requested and discount provided (.2).	3.20	0.00	KDM
	[Case administration] (No charge) Revise 12th fee application.	2.30	0.00	MJS
Aug-28-15	[Case administration] (No charge) Emails from and to counsel for SEC regarding their consideration of our 12th Interim Fee Application and provide update to the Receiver regarding same.	0.20	0.00	KDM

Aug-31-15	[Case administration] Emails from and to counsel for the SEC regarding the cash on hand in the Estate and the status of asset recovery and expenses of the Estate (.2).	0.20	53.00	KDM
	[Case administration] (Fee Application) (No charge) Emails from and to counsel for SEC regarding the 12th Fee Application and certain recommended revisions to be made and revise Fee Application accordingly (.2); coordinate and assist with finalizing and filing the Fee Application (.2).	0.40	0.00	KDM
	[Case administration] Begin reviewing claims (1.5); establish a tracking chart for processing claims (0.8); strategize with K. Murena regarding claims review process (0.5); send emails to forensic accountant asking for forensic tracing documentation (0.2).	3.00	795.00	CP
Sep-02-15	[Case administration] (No charge) Travel to Atlanta for deposition and settlement discussion.	3.00	0.00	MME
Sep-03-15	[Case administration] (No charge) Return travel from Atlanta.	3.00	0.00	MME
	[Case administration] (No charge) Return travel from Atlanta.	3.00	0.00	PFV
Sep-04-15	[Case administration] Emails from and to investor regarding the upcoming restitution hearing in A.L. Price's criminal action and status of the claims process (.3); follow up email from investor regarding related issues (.1).	0.40	106.00	KDM
Sep-10-15	[Case administration] Emails from and to AUSA handling the restitution hearing in Price's criminal action regarding three investors on investor loss report that Price is challenging and obtaining from forensic accountant back-up documentation regarding each of those investors (.2); exchange emails with forensic accountant regarding same (.2); receive and review analysis and supporting documentation from forensic accountant	3.10	821.50	KDM

regarding the investors being challenged by Price and review email from AUSA regarding his analysis and Price's specific objections to the inclusion of certain investors (.4); emails with forensic accountant and AUSA whether testimony of forensic accountant will be necessary at the hearing (.1); exchange emails with AUSA regarding preparation of Declaration of Forensic Accountant for restitution hearing (.2); exchange further emails with AUSA regarding the productions received from various banks pursuant to Subpoenas from the Receiver whether affidavits from records custodians were provided for evidentiary purposes, and review various productions to confirm whether affidavits were provided (.8); review and revise draft Declaration of forensic accountant and review certain underlying documentation referenced in the Declaration to confirm statements therein and send to AUSA with comments and explanation regarding revisions (.6); continue working with forensic accountant on updating the investor losses analysis for purposes of the restitution hearing and the claims administration process (.6).

Sep-11-15	[Case administration] Exchange multiple emails with AUSA and forensic accountant regarding updates to the forensic analysis of customer losses for purposes of responding to Price's objection to the investor analysis submitted to the Court for the restitution hearing, review information and documents regarding transfers to and from investors, and work on determining what revisions should be made to the investor analysis based on new information and documents obtained in the claims process or otherwise (1.3); review updated Declaration of forensic accountant to be submitted to Court in response to Price's objections to investor loss analysis and proposed further revisions (.3); exchange multiple emails with AUSA regarding our efforts to obtain affidavits from banks provided in conjunction with their productions in response to the Receiver's subpoenas and continue working on obtaining affidavits (.9); telephone calls from and to AUSA regarding	3.30	874.50	KDM
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same (.3); review various affidavits from banks and forward to AUSA with explanations regarding the affidavits obtained and the accounts covered by those affidavits (.3); confirm which productions did not come with affidavits and coordinate obtaining affidavits from banks for productions related to particular accounts of Receivership Defendants (.2).

Sep-14-15	[Case administration] Multiple emails from and to AUSA regarding the latest version of the Declaration of forensic accountant for purposes of the restitution hearing in Price's criminal action, review the revised Declaration and supporting documentation and forward to forensic accountant for review, revisions and execution (1.4); exchange emails with forensic accountant regarding the Declarations, the need to confirm certain information and supporting documentation, and possible revisions to the Declaration and additional support documents (.3); further emails with AUSA regarding same (.2).	1.90	503.50	KDM
Sep-15-15	[Case administration] (Reduced time) Exchange several emails with AUSA handling restitution hearing regarding the revisions to the Declaration of forensic accountant regarding the investor loss database and review the latest version of the Declaration (.4); exchange emails with forensic accountant regarding revisions to the Declaration, documents referenced in the Declaration, additional documents required from the AUSA related to the Declaration, and related matters, review the latest revisions to Declaration and provide input regarding same (.4 - reduced); exchange emails with AUSA and forensic accountant regarding certain supporting documents and further revisions to the Declaration by the forensic accountant and by the AUSA and review same (.4); emails with forensic accountant and AUSA regarding whether in-person testimony of the forensic accountant will be necessary based on objections of Price to the investor loss analysis (.2); exchange emails with forensic accountant and AUSA regarding logistics and expenses	2.40	636.00	KDM

for purposes of the restitution hearing and telephone call with forensic accountant regarding same (.5); emails to and from forensic accountant and AUSA regarding updates to the investor loss analysis and certain supporting documentation provided by investors in claims process and review the updated analysis (.3 - reduced); exchange emails with forensic accountant and AUSA regarding determining who will testify at the hearing on behalf of the forensic accountant and certain revisions to be made to the Declaration depending on who will be testifying (.1); exchange emails with local counsel regarding the status of the receivership and various pending litigation matters (.1)..

Sep-16-15	[Case administration] Exchange further emails with the AUSA regarding the restitution hearing in the criminal action against Price and logistics, scheduling, and preparation (.3); emails from and to forensic accountant regarding preparation for hearing and related matters (.3); exchange emails with forensic accountant and AUSA regarding the final version of the Declaration of forensic accountant, review the latest version, and coordinate having forensic accountant confirm the accuracy of the latest revisions prior to execution (.3).	0.90	238.50	KDM
Sep-17-15	[Case administration] Emails from and to the Judge's law clerk regarding the status of the receivership and various pending actions and the possible administrative closure of the case (.5); email from forensic accountant regarding final revisions to the Declaration of forensic accountant regarding investor losses and the analysis of the forensic accountant for purposes of the restitution hearing in criminal action against Price and review the final revisions (.3); emails with AUSA regarding the changes to the Declaration, the underlying documents and preparations for the restitution hearing (.2); email from forensic accountant forwarding final executed version of the Declaration and seeking to coordinate time to prepare for hearing (.1).	1.10	291.50	KDM

Sep-18-15	[Case administration] Work on preparing forensic accountant for restitution hearing, exchange emails with AUSA and forensic accountant regarding same, review detailed list of topics to be addressed at hearing, and gather and review information and documents related to those topics (1.2); exchange emails with AUSA regarding certain matters related to the restitution hearing (.2); exchange emails with Receiver regarding the status of certain recoveries of assets, gather information and provide it to Receiver (.7); emails from and to the Receiver regarding the restitution hearing (.2); exchange further emails with the Judge's law clerk regarding the administrative closure of the case and provide update to Receiver (.3); exchange emails with the Judge's law clerk regarding the counsel still involved in the case and provide information to the law clerk regarding same (.2).	2.80	742.00	KDM
Sep-21-15	[Case administration] Emails and telephone calls from and to counsel for SEC regarding the possible administrative closure of the enforcement action and discuss with Receiver (.3); exchange emails with counsel for FDIC-R regarding the possible administrative closure of the enforcement action and the effect on the receivership (.2).	0.50	132.50	KDM
Sep-22-15	[Case administration] Exchange emails with counsel for Genworth regarding the effect of the possible administrative closure of the enforcement action (.2).	0.20	53.00	KDM
Sep-23-15	[Case administration] Telephone calls and emails from and to AUSA regarding certain issues related to investors for purposes of the upcoming restitution hearing of Price in his criminal action (.6); search for emails and documents regarding Price's comments and input related to certain investors on the forensic accountant's investor loss analysis (.4); exchange emails with AUSA regarding certain emails sent to forensic accountants regarding investor information obtained from Price (.3).	1.30	344.50	KDM

Sep-24-15	[Case administration] Emails from and to AUSA regarding the restitution hearing, the testimony of the forensic accountant, the position of A.L. Price, and related matters (.3); emails from and to forensic accountant regarding same (.2); review Restitution Order and Minute Entry from hearing, strategize regarding the possible effects of the Order on the claims process in the receivership, and exchange emails with AUSA regarding same and possible need to have Restitution Order amended to make the investor losses subject to final determination in Receivership Court (.6).	1.10	291.50	KDM
Sep-28-15	[Case administration] Telephone call from counsel for Genworth regarding the possible administrative closure of the enforcement action and the effect on the receivership and the asset recovery efforts of the Receiver (.2); exchange emails with AUSA regarding updated investor contact information, review document provided by AUSA, and coordinate having updated list sent to AUSA (.2).	0.40	106.00	KDM
Sep-29-15	[Case administration] Emails from and to forensic accountant regarding the contact information of the investors and recent communications with the AUSA regarding same (.2).	0.20	53.00	KDM
Sep-30-15	[Case administration] Review Order directing clerk to administratively close the enforcement action subject to the resolution of the receivership and discuss with team members the effect it will have on our future court filings (.2); exchange emails with counsel for various parties regarding same and the effect on the Receivership (.2).	0.40	106.00	KDM
Oct-02-15	[Case administration] Follow up on status of gathering and providing to AUSA updated contact information for the investors for purposes of sending notices of the Restitution Order, review the latest list to be sent to AUSA, and coordinate sending to AUSA (.3); follow up with AUSA regarding certain language in the Restitution Order and the	0.50	132.50	KDM

effect on the claims administration process
(.2).

Oct-04-15	[Case administration] (No charge) Travel to Atlanta for mediation.	2.00	0.00	MME
Oct-05-15	[Case administration] (No charge) Return travel from Atlanta.	2.00	0.00	MME
Oct-07-15	[Case administration] Review Receivership website and coordinate having certain recent filings posted to the website.	0.20	53.00	KDM
Oct-09-15	[Case administration] Gather and provide information to C. Perez for purposes of preparation of Receiver's 13th Status Report.	0.60	159.00	KDM
	[Case administration] Draft 13th Status Report and discuss same with K. Murena.	2.70	715.50	CP
Oct-12-15	[Case administration] Continue drafting 13th Status Report and discuss same with K. Murena.	2.50	662.50	CP
	[Case administration] Update information regarding Status Report.	0.10	26.50	MDV
Oct-14-15	[Case administration] Review signed Declaration of sole heir of deceased claimant in support of his claim and discuss with C. Perez the treatment of his claim based on Declaration and other documents submitted (.2); review and forward proof of claim to C. Perez for processing and analysis and discuss certain aspects of that claims (.3).	0.50	132.50	KDM
Oct-19-15	[Case administration] Work on gathering information regarding the activities and recoveries during the Reporting Period for purposes of preparation of the Receiver's 13th Status Report, and exchange emails with team members and the Receiver's other professionals regarding same.	1.10	291.50	KDM
Oct-20-15	[Case administration] Continue working with C. Perez on various aspects of the Receiver's	1.20	318.00	KDM

13th Status Report, including providing information related to asset recovery efforts and accomplishments and the status of pending litigation matters (1.2).

	[Case administration] (No charge) Assist attorney C. Perez in filling in missing information in the Receiver's 13th Status Report and contact Venezuelan counsel to obtain the reconciliation and value of the trust account.	0.40	0.00	pl
Oct-22-15	[Case administration] Revise 13th Status Report (0.9).	0.90	238.50	CP
Oct-26-15	[Case administration] Revise 13th Status Report .	0.30	79.50	CP
	[Case administration] Provide C. Perez with information for status report regarding investors.	0.50	75.00	MJS
Oct-27-15	[Case administration] Review and revise draft of Receiver's 13th Status Report (3.0); coordinate further revisions to the Report and exchange emails with team members regarding the preparation of Exhibits to the Report and certain information to be included in those Exhibits (.2).	3.20	848.00	KDM
	[Case administration] Assist attorney K. Murena in making edits to Receiver's 13th Status Report.	0.50	37.50	pl
Oct-28-15	[Case administration] Make further revisions to the Receiver's 13th Status Report and coordinate updating the amounts in the Report (.7); work with team members on revising and updating the exhibits and coordinate compiling with the Report and presenting them to the Receiver for review (.4).	1.10	291.50	KDM
	[Case administration] (No charge) Assist attorney K. Murena in making edits to 13th Status Report and update exhibits to the status report.	1.70	0.00	pl

Oct-29-15	[Case administration] Review and revise Receiver's Thirteenth Status Report.	1.40	371.00	MME
	[Case administration] Confer with counsel regarding status report.	0.20	53.00	MME
	[Case administration] Email with IT specialist regarding certain computer files of Price he attempted to decrypt and coordinate payment of his invoice (.2); discuss with Receiver the 13th Status Report, the status of certain litigation matters and asset recover efforts, and certain revisions to be made to the Report (.2); work on revising the Report in accordance with the Receiver's directions (.5).	0.90	238.50	KDM
Oct-30-15	[Case administration] Work on finalizing all of the Exhibits to the Receiver's 13th Status Report, including the reconciliation of the trust account of Venezuela counsel and the list of assets of the Estate (.5); review final versions of the Report and all Exhibits and coordinate filing same with the Court (.4).	0.90	238.50	KDM
	[Case administration] (No charge) Finalize exhibit to the Receiver's 13th Status Report and file/serve electronically.	1.10	0.00	pl
Aug-27-15	[Claim Administration] Telephone calls from investors regarding the claims process and filling out the claims forms and coordinate providing information and explanations to the investors (.3); review email from an investor regarding the claims process and coordinate responding to questions (.1); review claims filed by certain investors and coordinate processing and analyzing of those claims (.2).	0.60	159.00	KDM
Aug-28-15	[Claim Administration] Review additional claims received from investors and coordinate processing and analyzing of those claims (.3); review Order approving agreement with Genworth and exchange emails with counsel for Genworth confirming that they need not submit a claim form in light of Court Order approving claim amount (.2).	0.50	132.50	KDM

Aug-31-15	[Claim Administration] Strategize with C. Perez regarding processing and recommended treatment of the claims filed by investors and the forensic analyses and spreadsheets to be used to process the claims and coordinating with forensic accountant to obtain backup documentation if necessary (.2); review recently received claims and send to C. Perez to be processed (.2); strategize with C. Perez regarding a particular filed claim and the facts underlying that investor's alleged transfers to the Receivership Defendants (.2).	0.60	159.00	KDM
Sep-01-15	[Claim Administration] Continue reviewing claims and supporting documentation, preparing tracking chart and making claims determinations (1.2); communicate with forensic accountant regarding forensic tracing (.2).	1.40	371.00	CP
	[Claim Administration] Continue to search Accurant for contact information for claimants with insufficient information for purposes of sending them a proof of claim form.	1.30	97.50	pl
Sep-02-15	[Claim Administration] Receive additional claims from investors and coordinate processing and analyzing of those claims (.1); exchange emails with C. Perez regarding the supporting documentation provided with certain claims and to be requested from claimants to process those claims and review certain purportedly supporting documents (.4); strategize with C. Perez regarding the treatment of certain claims based on the transfers the claimants made, the timing of those transfers, and the entities to which they made the transfers (.5); review draft spreadsheet to record status of processing and analyzing the claims and the proposed treatment of claims, and discuss with C. Perez additional information to be included in spreadsheet (.2).	1.20	318.00	KDM
Sep-03-15	[Claim Administration] Continue working with C. Perez on processing certain claims of investors and resolving issues raised in the claims including missing documentation (.4);	0.90	238.50	KDM

review various documents provided by investors and the forensic accountant's investor analyses and strategize regarding treatment of those investors' claims (.5).

Sep-04-15	[Claim Administration] Work with team members on resolving issues related to the claims process, inquiries from claimants, and returned claim packets (.5); strategize with C. Perez regarding the treatment of one of the claims based on the documents provided with the claim (.3); review updated spreadsheet with all the claims processed and analyzed thus far and discuss with C. Perez (.2); telephone call and email from investors regarding the claims process and the submission of their claims (.3).	1.30	344.50	KDM
	[Claim Administration] Review and Process claims filed by investors and strategize with K. Murena regarding same.	1.00	265.00	CP
Sep-08-15	[Claim Administration] Receive and review claims from investors and coordinate having C. Perez process and analyze those claims and update the spreadsheet regarding the proposed treatment of claims (.2); receive update regarding the status of processing all claims received thus far (.1).	0.30	79.50	KDM
Sep-09-15	[Claim Administration] Review claims and information from forensic accountant.	1.00	265.00	CP
Sep-10-15	[Claim Administration] Emails with forensic accountant regarding their analysis of certain transfers between investors and the Receivership Defendants and back up information regarding those transfers, review certain back up documents, and coordinate having C. Perez use that information and documents to process the claims of those two investors (.4); receive and review claims from four investors and coordinate having C. Perez process and analyze those claims and update the claims analysis spreadsheet (.1); coordinate sending Claims Packet to IRS office that sent the Tax Notice to PFGBI and confirm that the IRS's main office was served	1.50	397.50	KDM

with the Claims Packet (.2); work on resolving certain issues related to the processing and analyzing certain claims filed by investors (.3); receive and review additional backup information from forensic accountant regarding certain transfers to and from claimants and strategize with C. Perez regarding the proposed treatment of those claims (.5).

Sep-11-15	[Claim Administration] Review the latest claim forms received from investors, coordinate having C. Perez process and analyze those claims, and receive report from C. Perez regarding the status of the processing of claims and the spreadsheet of proposed treatment of claims (.2); provide new information and documents obtained from claimants in the claims process, with explanation regarding same, to the forensic accountant for purposes of updating the investor loss analysis (.3); receive backup information from forensic accountant regarding certain claims and discuss with C. Perez for purposes of analyzing certain investor claims (.3).	0.80	212.00	KDM
	[Claim Administration] Review filed claims and information from forensic accountant to make determinations for allowed claims and discuss proposed treatment and status with K. Murena.	2.00	530.00	CP
Sep-14-15	[Claim Administration] Review six recently submitted proof of claim forms and coordinate having C. Perez process and analyze those claims and supporting documentation provided (.2); work on obtaining additional documents from claimants regarding their claims including making phone calls to claimants and reviewing and comparing investor documents to documents underlying forensic accountants' investor loss analysis and the consolidated account reconstruction (.9); exchange emails with forensic accountant regarding certain documents underlying investor loss analysis and account reconstruction and documents	1.40	371.00	KDM

recently received from investors in claims process (.3).

Sep-15-15	[Claim Administration] Receive analysis from forensic accountant regarding certain claims submitted by investors, the supporting documentation they provided, and additional documents required from those investors to process their claims and allow the amount they are seeking, discuss with C. Perez, and coordinate obtaining additional documents from claimants (.5); exchange emails with forensic accountant regarding the foregoing and the revisions being made to the consolidated account reconstruction and the investor loss analysis (.4); discuss with the Receiver the claims received thus far and the status of and procedure for processing those claims (.1).	1.00	265.00	KDM
	[Claim Administration] Review filed claims and information from forensic accountant to make determinations for allowed claims and strategize with K. Murena regarding same.	2.00	530.00	CP
Sep-16-15	[Claim Administration] Work with C. Perez on resolving certain issues related to the claim of a deceased investor and confirming the status of the probate estate and the decedent's will, and coordinate contacting executor of the will to obtain certain documentation (.4); receive and review proof of claim forms and supporting documents submitted by investors and coordinate having C. Perez process and analyze those claims (.2); exchange multiple emails with forensic accountant regarding certain documents related to the claims of investors and updating the investor loss database to comport with the claims analysis spreadsheet (.3); review the latest claims analysis and discuss status of processing claims with C. Perez (.2).	1.10	291.50	KDM
Sep-17-15	[Claim Administration] Assist with processing of certain claims and addressing issues raised in those claims (.5); follow up on status of resolving issue related to deceased claimant and confirming the decedent's will (.2).	0.70	185.50	KDM

	[Claim Administration] Review filed claims and information from forensic accountant to make determinations for allowed claims and strategize with K. Murena regarding same.	2.60	689.00	CP
Sep-21-15	[Claim Administration] Receive claims from investor claimants and coordinate having C. Perez process and analyze them and update the claims spreadsheet (.2); follow up with C. Perez regarding the status of processing and analyzing all claims received thus far (.1).	0.30	79.50	KDM
Sep-22-15	[Claim Administration] Work with C. Perez on resolving various issues related to the claims submitted by certain claimants including the funds they transferred to FSC Securities and AIG and the transfers from those institutions to the Receivership entities, coordinate contacting counsel for investors in the FINRA actions against FSC Securities, and strategize regarding the treatment of various claims based on information and documents to be obtained from such counsel (.9); receive and review claims from investors and coordinate processing and analysis of those claims (.1).	1.00	265.00	KDM
	[Claim Administration] Review claims filed by investors and make allowance determinations (2.0); exchange emails with forensic accountant and telephone call with K. Murena regarding same (1.2).	3.20	848.00	CP
Sep-23-15	[Claim Administration] Confer with Counsel regarding status of claims process and proposed treatment of claims.	0.30	79.50	MME
	[Claim Administration] (Reduced time) Review certain investor claims and supporting documentation and strategize with C. Perez regarding the treatment of certain claims and the reduction of claims based on recoveries by investors (.8); review updated forensic analysis of transfers of those investors and provide input regarding proposed treatment of their claims (.4 - reduced); strategize with Receiver regarding same and report to Receiver the status of the claims process, the	1.50	397.50	KDM

analysis and proposed treatment of all claims, and upcoming deadlines (.3).

Sep-24-15	[Claim Administration] Exchange multiple emails with forensic accountant regarding their analysis of certain transfers to and from investors for purposes of confirming investors' claim amounts and determining the appropriate allowed amounts (.7); strategize with C. Perez regarding the forensic analysis and the proposed treatment of various claims and discuss the status of processing all claims received thus far and the claims analysis spreadsheet (1.6).	2.30	609.50	KDM
	[Claim Administration] Review and process claims filed by investors, exchange emails with forensic accountant and strategize with K. Murena regarding same.	1.60	424.00	CP
Sep-25-15	[Claim Administration] Emails from forensic accountant regarding their analysis of transfers to and from four investors for purposes of confirming their claim amounts and determining the appropriate allowed amounts (.6); discuss with C. Perez the forensic analysis and the proposed treatment of those claims (.6).	1.20	318.00	KDM
	[Claim Administration] Review and process claims filed by investors; exchange emails with forensic accountant, prepare declaration for investor, and discuss treatment of claims and forensic analysis with K. Murena.	2.80	742.00	CP
Sep-28-15	[Claim Administration] Review emails from forensic accountant providing analysis of transfers to and from various investors, and certain backup documentation, for purposes of confirming their claim amounts and determining the appropriate allowed amounts (.7); discuss with C. Perez this latest forensic analysis and the proposed treatment of those claims (.4); telephone call from counsel for Genworth regarding the treatment of his client's claim in the claims process pursuant to the Order approving the settlement with Genworth (.2); receive four new claims from	1.40	371.00	KDM

investors and have C. Perez process and analyze them (.1).

	[Claim Administration] Review claims filed by investors, exchange emails with forensic accountant and make claims determinations, and discuss proposed treatment with K. Murena.	2.40	636.00	CP
Sep-29-15	[Claim Administration] Review draft of Declaration of a claimant who is the executor of an investor's will and the sole heir of that investor and coordinate having investor review and execute the Declaration (.2); review the latest analysis from the forensic accountant regarding certain claims filed by investors and discuss proposed treatment of those claims with C. Perez (.2); receive and review claims filed by investors and coordinate having C. Perez process the claims (.1).	0.50	132.50	KDM
Sep-30-15	[Claim Administration] Work on resolving issue raised by one claimant's proof of claim and strategize with C. Perez regarding same (.6); exchange emails with forensic accountant regarding same (.2); review amended claim of an investor and coordinate comparing to original claim and having it processed and analyzed (.1); review the latest updated claims analysis spreadsheet and discuss the status with C. Perez (.2); review analysis from forensic accountant regarding claims filed by other investors and additional information required to complete the analysis and strategize regarding same (.2).	1.30	344.50	KDM
	[Claim Administration] Review and process claims filed by investors, exchange emails with forensic accountant, and strategize with K. Murena regarding same.	2.00	530.00	CP
Oct-02-15	[Claim Administration] Email from forensic accountant regarding forensic analysis of certain transfers between investors and receivership entities and recommendation regarding the treatment of certain claims and discuss with C. Perez resolving issues raised	0.20	53.00	KDM

and determining the amount of the claims to be allowed.

Oct-05-15	[Claim Administration] Review the latest proofs of claim filed by investors and coordinate having C. Perez process and analyze those claims (.1); receive report regarding the status of processing and analyzing all claims received thus far and the proposed treatment of the claims (.2); review forensic accountants' analyses of two of the claims and strategize with C. Perez regarding same and additional information required to complete analyses and make recommendations regarding the treatment of those claims (.3).	0.60	159.00	KDM
	[Claim Administration] Review and analyze claims filed by investors and continue to make claims determinations and exchange emails with forensic accountant and discuss same with K. Murena.	2.50	662.50	CP
	[Claim Administration] (No charge) Review proof of claim forms and update investor list with telephone numbers, and changes of address.	1.40	0.00	pl
Oct-06-15	[Claim Administration] (Reduced time) Work on investigating various transfers from investors to Entrust and/or IAG as custodian and then to Advanta IRA as custodian before being transferred to receivership entities or funds under the control of a receivership entity, for purposes of assisting forensic accountant and C. Perez to analyze the claims of various investors (.8); strategize with C. Perez regarding treatment of amounts that claimants received from FINRA arbitration against FSC Securities based on the amounts of attorneys' fees and the number of claimants who brought FINRA actions (.2 - reduced).	1.00	265.00	KDM
	[Claim Administration] Analyze claims filed by investors and make claims determinations; exchange emails regarding same with forensic accountant and discuss same with K. Murena.	2.60	689.00	CP

Oct-07-15	<p>[Claim Administration] (reduced time) Continue working on investigating transfers from investors to Entrust and/or IAG as custodian and then to Advanta IRA as custodian before being transferred to receivership entities or funds under their control, for purposes of assisting with analyses of investor claims (.5 - reduced); provide further guidance to C. Perez for purposes of determining amount of claims of claimants who received recoveries from FINRA arbitration (.3); review letter from counsel for various claimants requesting agreement to confidentiality of documents related to arbitration proceedings to be provided to Receiver for claim process, have Receiver review and execute letter, and coordinate sending it to counsel for investors (.2).</p>	1.00	265.00	KDM
	<p>[Claim Administration] Analyze claims filed by investors and make claims determinations; exchange emails regarding same with forensic accountant and discuss same with K. Murena.</p>	1.70	450.50	CP
Oct-08-15	<p>[Claim Administration] Review certain claims submitted by claimants and work on clarifying the information and documents provided by claimant, confirm that its was properly processed, and discuss with C. Perez (.3); work with C. Perez on resolving certain issues related to names of the claimants to receive allowed based on the names of the accounts from which the investments were made rather than the name listed on the proofs of claims (.4); receive report from C. Perez regarding her analysis and the analysis of the forensic accountant on various claims and strategize regarding the proposed treatment of those claims (.6).</p>	1.30	344.50	KDM
	<p>[Claim Administration] Review claims from investors and make claims determinations (1.9); review forensic reconstruction regarding same(.7); telephone call with forensic accountant to clarify same (.4); meeting with K. Murena regarding claims process status (.6); telephone call with various investors regarding additional documentation required (1.0).</p>	4.60	1,219.00	CP

Oct-12-15	[Claim Administration] Discuss with Receiver the claims bar date and the status of processing and analyzing the claims of investors and the procedure for informing them of the allowance or disallowance of their claims and the objection/appeal process (.2); receive claims from investors and follow up with C. Perez on status of processing and analyzing all claims received thus far (.2); review transaction details and underlying documentation from forensic accountant and discuss same with C. Perez (.5).	0.90	238.50	KDM
Oct-13-15	[Claim Administration] Review claim of Convergen Prime for attorneys' fees incurred in defending against the FDIC-R's claims and cover letter explaining basis for claim and discuss with Receiver and C. Perez (.3); review analyses, transaction details and underlying documents provided by forensic accountant for particular claims and discuss with C. Perez processing of claims and additional information needed from claimants (.4); review prior emails with forensic accountant and transaction detail of forensic accountant from forensic accountant related to claim of K. McSwain, review the Settlement Agreement with KM Homes regarding the treatment of his claim, and provide information to C. Perez and forensic accountant for purposes of analyzing his claim (.5).	1.20	318.00	KDM
Oct-20-15	[Claim Administration] Strategize with C. Perez regarding the treatment of the claim filed by Convergen Prime (.3); discuss with C. Perez the form of the letters to be sent to all claimants allowing or disallowing their claims (.2); receive report from C. Perez regarding the status of processing and analyzing all claims filed by claimants (.1).	0.60	159.00	KDM
	[Claim Administration] Review investor proofs of claim and process claims to determine allowed amounts; exchange emails with forensic accountant regarding same;	2.40	636.00	CP

review chart from Chapman regarding FSC settlement amounts regarding claims allowance, and provide update to K. Murena regarding status of claims process.

Oct-21-15	[Claim Administration] Continue processing investors' proofs of claim to make claim determinations and exchange emails with forensic accountant regarding same.	2.50	662.50	CP
Oct-22-15	[Claim Administration] Continue reviewing and processing investors' proofs of claims; exchange emails with forensic accountant and contact claimants re: same (3.2).	3.20	848.00	CP
Oct-23-15	[Claim Administration] Review multiple emails from forensic accountant regarding analysis of claims filed by investors and strategize with C. Perez regarding the proposed treatment of those claims and further documents requested from investors to process their claims (.5); telephone call from investor regarding the claims bar date and the claim packet he submitted, discuss with C. Perez his questions, the claim he filed and the FINRA action with which he was involved, and coordinate having C. Perez respond to his questions (.2).	0.70	185.50	KDM
	[Claim Administration] Continue reviewing and processing investors' proofs of claims; exchange emails with forensic accountant, discuss with K. Murena and contact claimants regarding same.	2.50	662.50	CP
Oct-25-15	[Claim Administration] (Reduced time) Work with C. Perez on processing certain investor claims, strategizing regarding responding to certain investor inquiries, determining whether additional documents are required from apparent net winners who claim to be net losers, reconciling certain investor claims regarding transfers to and from Receivership Entities with the forensic analyses prepared from bank statements, and determining the appropriate treatment of various claims (1.0 - reduced).	1.00	265.00	KDM

Oct-26-15	[Claim Administration] Telephone call with forensic accountant regarding claims process (0.5); continue processing claims and make claims allowance determinations (1.6).	2.10	556.50	CP
Oct-27-15	[Claim Administration] Emails from forensic accountant and C. Perez regarding certain claims submitted in claims process, the forensic analyses regarding the transfers to and from the claimants, the additional documents required from claimants to determine if they are net winners or net losers, and the possible need to file a fraudulent transfer action or enter into a tolling agreement with certain claimants until the transfer amounts are confirmed (.8); coordinate contacting certain claimants to follow up on previous requests to enter into tolling agreements and discuss with C. Perez the forensic determination regarding the allocation of certain transfers to certain claimants (.3); receive update from C. Perez regarding her analysis and research regarding whether claim amounts should be reduced by the attorneys' fees and costs that were recovered but deducted from their net recoveries and strategize regarding same (.2).	1.30	344.50	KDM
	[Claim Administration] Research regarding reduction of allowable claim by net recovery from third party and treatment of reduction and discuss with K. Murena and prepare email summarizing research (2.7); continue processing claims received from investors and telephone calls with investors regarding same (2.2).	4.90	1,298.50	CP
Oct-28-15	[Claim Administration] Review and revise the Receiver's Determination letter to be sent to all claimants who submitted claims in the claims process and the proposed Exhibit to be attached to each letter setting forth the summary of the Receiver's calculation of the allowable amount or disallowance of each claim (.6); receive report from C. Perez and strategize regarding her analysis and the forensic accountant's analysis of claim submitted by a particular claimant, the revision to the investor loss database based on his claim, the factor to consider in determining	2.40	636.00	KDM

whether he is a net winner or net loser, the initial discussions with his counsel regarding his claim and the Receiver's possible claim against him, and the documents to be sent to claimant's counsel to resolve issues regarding his claim (.8); review the documents to be sent to counsel and strategize with C. Perez regarding same and the additional documents to request from counsel to support claimant's claim (.6); provide further guidance to C. Perez regarding the proposed treatment of claims of claimants who received recoveries from third parties but paid fees and costs in connection with such recoveries (.4).

	[Claim Administration] Draft proposed letter to claimants (1.0); telephone calls with claimants regarding missing documentation and support for claims (1.2); continue processing claims and strategize with K. Murena regarding the claims process status and precessing claims (1.2).	3.40	901.00	CP
Oct-29-15	[Claim Administration] Confer with counsel regarding the status of claims and the process for late claims.	0.20	53.00	MME
	[Claim Administration] Email from C. Perez regarding further additions to be made to the letter to be sent to claimants in claims process explaining the Receiver's determinations of their claims and coordinate adding certain language regarding method of calculation of allowable amount of claim (.2); discuss with C. Perez further revisions to be made to the determination letter and the status of processing all claims received thus far (.2); review revised version of the determination letter and present to Receiver for review and approval and discuss with Receiver the status of the claims process, the receipt of late-filed claims, the claim filed by Convergen Prime, and the deadline to serve the determination letters (.3).	0.70	185.50	KDM
	[Claim Administration] Telephone call with investors regarding proofs of claim and documentation (0.8); revise proposed letter to	3.00	795.00	CP

claimants and send email to K. Murena regarding same (1.0); continue processing claims (1.2).

Oct-30-15	[Claim Administration] Review and revise draft letter to claimants.	0.30	79.50	MME
Aug-13-15	[Claims Process] Discuss claims process with counsel in light of order approving process.	0.30	79.50	MME
Aug-17-15	[Claims Process] (No charge) Review investor list and contact investors with insufficient mailing address or email address for purposes of sending Claims Packet to all investors.	5.40	0.00	pl
Aug-18-15	[Claims Process] Continue working with team members on confirming contact information for various investors and coordinate sending letters with the Claims Packages to certain investors who received net gains following up on our request that they sign tolling agreements regarding the Receiver's fraudulent transfer claims against them (.4).	0.40	106.00	KDM
	[Claims Process] (No charge) Continue to contact investors with insufficient mailing address or email address for purposes of sending Claims Packet to all investors.	1.60	0.00	pl
Aug-19-15	[Claims Process] (No charge) Fill in dates and deadlines for Proof of Claim form and continue to contact investors with insufficient mailing address or email address for purposes of sending Claims Packet to all investors.	3.00	0.00	pl
Aug-20-15	[Claims Process] (No charge) Prepare draft cover letter to investors and creditors for attorney K. Murena's review (.2); begin preparing Claims Packets for mailing to investors and creditors(1.2); continue to contact and look up certain investors with incomplete addresses (.7).	2.10	0.00	pl
Aug-21-15	[Claims Process] Review and revise cover letter to investors and cover letter to creditor to be sent with Claims Packages containing Legal Notice and Proof of Claim and Release	1.20	318.00	KDM

form (.4); review final list of investors to which claims packages will be sent to confirm correct recipients (.2); work on confirming the creditors to which claims packages should be sent (.2); work on confirming the amounts of the allowed claims that were already agreed to in Agreements approved by the Court (.3); coordinate duplicating cover letters and preparing mailing of all letters and claims packages (.1).

[Claims Process] (No charge) Review claims process letter.	0.10	0.00	MJS
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Aug-24-15	[Claims Process] Confirm agreement with KM Homes regarding the reduction in the claim of K. McSwain and confirm that claims package is sent to him (.2); work with team members on sending out all of the claims packages to all investors and creditors (.8); prepare cover letter to counsel for certain creditors explaining why they are receiving the claims package even though their clients' claims have already been agreed to and coordinate sending letter and claims package to those counsel (.3).	1.30	344.50	KDM
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[Claims Process] (No charge) Review investor contact list and create mass email to all investors with valid email address attaching a copy of the cover letter to investors regarding the claims process, notice of claims process and the proof of claim form.	0.60	0.00	pl
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HOUR TOTALS:	442.50	\$97,999.50
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ATTORNEY/PARALEGAL SUMMARY

NAME	INITIALS	HOURS	RATE	AMOUNT
Melanie E. Damian	MME	48.60	\$265.00	\$8,983.50
Peter F. Valori	PFV	21.90	\$265.00	\$4,717.00
Guy F. Giberson	GFG	0.50	\$265.00	\$132.50
Kenneth D. Murena	KDM	135.70	\$265.00	\$31,588.00

Barbara A. Junge	BAJ	101.10	\$265.00	\$26,877.50
Casandra Perez Murena	CP	72.40	\$265.00	\$19,186.00
Melissa Damian Visconti	MDV	15.50	\$265.00	\$4,107.50
Amanda Fernandez	AF	2.40	\$150.00	\$270.00
Melanie J. Spencer	MJS	22.10	\$150.00	\$1,980.00
Paralegal	pl	22.30	\$75.00	\$157.50

DISBURSEMENTS

	Pacer Photocopy	123.20
Aug-14-15	Postage 1 @ 2.30	2.30
Aug-31-15	Photocopies 1950 @ 0.12	234.00
	Postage 1 @ 0.70	0.70
	Lexis Nexis Accurint Research Kpxguqt	4.00
	Lexis Nexis Accurint Research Kpxguqt	12.00
	Lexis Nexis Accurint Research Kpxguqt	13.25
	Lexis Nexis Accurint Research Kpxguqt	36.75
	Lexis Nexis Accurint Research Kpxguqt	4.00
	Lexis Nexis Accurint Research Kpxguqt	4.00
	Lexis Nexis Accurint Research Kpxguqt	4.00
	Lexis Nexis Accurint Research Kpxguqt	4.00
	Lexis Nexis Accurint Research Kpxguqt	4.00
	Lexis Nexis Accurint Research Kpxguqt	10.25
	Lexis Nexis Accurint Research Kpxguqt	4.00
	Lexis Nexis Accurint Research Kpxguqt	12.00
	Lexis Nexis Accurint Research Kpxguqt	12.00
	Lexis Nexis Accurint Research Kpxguqt	12.00
	Lexis Nexis Accurint Research Kpxguqt	4.00
	Lexis Nexis Accurint Research Kpxguqt	8.00
	Lexis Nexis Accurint Research Kpxguqt	20.00
	Lexis Nexis Accurint Research Kpxguqt	11.50
	Lexis Nexis Accurint Research Kpxguqt	8.00

	Lexis Nexis Accurint Research Investor	4.00
	Lexis Nexis Accurint Research Investor	4.00
	Lexis Nexis Accurint Research Investor	9.00
	Lexis Nexis Accurint Research Investor	93.00
	Lexis Nexis Accurint Research Investor	4.00
	Lexis Nexis Accurint Research Investor	9.00
Sep-04-15	Postage 3 @ 1.40	4.20
Sep-10-15	Postage 2 @ 2.08	4.16
	Postage 1 @ 0.92	0.92
	Filing Fee: Certificate of Good Standing	18.00
Sep-14-15	Postage 2 @ 1.40	2.80
Sep-24-15	Postage 2 @ 1.40	2.80
Sep-30-15	Court Reporter: Depo I. Ratner Attendance & Transcript 9/2/15	593.85
	Lexis Nexis Accurint Research Investor	16.00
	Lexis Nexis Accurint Research Investor	12.00
	Lexis Nexis Accurint Research Investor	4.00
	Lexis Nexis Accurint Research Investor	17.25
	Lexis Nexis Accurint Research Investor	4.00
	Lexis Nexis Accurint Research Investor	8.00
	Lexis Nexis Accurint Research Investor	7.50
	Lexis Nexis Accurint Research Investor	12.00
	Lexis Nexis Accurint Research Investor	4.00
	Lexis Nexis Accurint Research Investor	4.00
	Lexis Nexis Accurint Research Investor	4.00
	Lexis Nexis Accurint Research Investor	4.00
	Lexis Nexis Accurint Research Investor	4.00
	Lexis Nexis Accurint Research Investor	4.00
	Lexis Nexis Accurint Research Investor	4.00
	Lexis Nexis Accurint Research Investor	4.00
Oct-05-15	Postage 3 @ 0.48	1.44
Oct-09-15	Postage 1 @ 1.40	1.40
Oct-31-15	Photocopies 176 @ 0.12	21.12
	Totals	<hr/> \$1,434.39

Total Fee & Disbursements

\$99,433.89**Balance Now Due**

\$9,455.: 9**Terms: Balance Due Upon Receipt**

Payments received after the billing date of Oct 31/15 may not be included on this statement.

TAX ID Number 20-1324240